

**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**[Docket No: FR-5667-N-02]**

**Notice of Senior Preservation Rental Assistance Contracts Award Process**

**AGENCY:** Office of the Assistant Secretary for Housing – Federal Housing Commissioner, HUD.

**ACTION:** Notice.

**SUMMARY:** The Section 202 Supportive Housing for the Elderly Act of 2010 (herein after referred to as the “2010 Act”), signed into law on January 2011, authorizes HUD to award Senior Preservation Rental Assistance Contracts (SPRACs) with 20-year terms to Owner-Applicants and existing Section 202 properties that meet the SPRAC eligibility criteria of this final Notice. The purpose of the SPRAC Program is to prevent the displacement of existing tenants of certain projects assisted under HUD’s Section 202 Supportive Housing for the Elderly program in the case of refinancing or recapitalization and to further preserve and maintain the affordability of Section 202 Direct Loan projects. In Fiscal Year (FY) 2012, \$16 million was made available for SPRAC funding. This final Notice establishes the process by which HUD will award SPRACs, and commences the solicitation of applications.

This final Notice follows a January 8, 2013, advance Notice in which HUD presented and solicited public comment on the proposed eligibility and award criteria. This final Notice takes into consideration the public comments received in response to the January 8, 2013, solicitation.

**DATES:** SPRAC Application Due Date: **September 3, 2013**. Owner-Applicants who are interested in being considered for a SPRAC award must submit electronic/digital versions of all required application elements specified under this final Notice to the following HUD e-mail

address: [SPRAC@hud.gov](mailto:SPRAC@hud.gov). HUD is only accepting electronic SPRAC application submissions under this round of program funding.

**FOR FURTHER INFORMATION CONTACT:** Margaret Salazar, Acting Director, Office of Affordable Housing Preservation, Office of Housing, Department of Housing and Urban Development, 451 7th Street, SW, Room 6230, Washington, DC 20410; telephone number 202-708-0001 (this is not a toll-free number). Persons with hearing or speech impairments may access this number through TTY by calling the toll-free Federal Relay Service at 800-877-8339.

**SUPPLEMENTARY INFORMATION:**

**I. Background**

The Section 202 Supportive Housing for the Elderly Act of 2010 (Public Law 111-372, 124 Stat. 4077, approved January 4, 2011) (2010 Act) authorizes HUD to provide SPRACs with 20-year terms to Owner-Applicants of existing Section 202 properties that meet the SPRAC eligibility criteria of this final Notice. The purpose of the SPRAC Program is to prevent the displacement of current tenants of certain projects assisted under HUD's Section 202 Supportive Housing for the Elderly program (Section 202 program) in the case of refinancing or recapitalization and to further preserve and maintain affordability of Section 202 Direct Loan projects. General authority for the prepayment of a Section 202 Direct Loan is provided by Section 811 of the American Homeownership and Economic Opportunity (AHEO) Act of 2000, as amended by the 2010 Act (12 U.S.C. 1701q note). Pursuant to this authority, SPRACs may be awarded by HUD to Section 202 properties with original interest rates of 6 percent or less (financed prior to 1974), as part of a recapitalization to address the physical needs of the property. In FY 2012, \$16 million was made available for SPRAC funding.

On January 8, 2013, at 78 FR 1224, HUD published a proposed notice in the Federal

Register that presented for public comment the proposed process by which HUD would award SPRACs, including the proposed application process, as well as the proposed eligibility and selection criteria. HUD solicited public comment for a period of 60 days.

## **II. Summary of Public Comments and HUD Responses**

The public comment period closed on March 11, 2013. HUD received public comments from 9 separate sources, including a development group, a religious organization, owners under the Section 202 program, a limited liability company assisting nonprofit organizations in developing and operating housing solutions, a network of 12 social enterprise nonprofits, a housing finance agency, and a nonprofit national housing and legal advocacy center. All public comments may be viewed in their entirety online at the following URL:

<http://www.regulations.gov/#!docketBrowser;rpp=25;so=ASC;sb=docId;po=0;D=HUD-2013-0003>.

### **A. General Comments**

All commenters were largely supportive of the award process proposed by HUD. A commenter expressed support for what the commenter described as a simple, fair approach to assure an opportune distribution of funding to Section 202 owners. Another commenter expressed appreciation for the opportunity to obtain additional subsidy for the oldest properties in the HUD portfolio. Commenters expressed appreciation that the notice allows for households who are not very low-income but who have been long-term tenants to remain in their units. Another commenter similarly stated that this feature was very beneficial to members of the elderly community whose incomes fall between 51 and 80 percent of median. Commenters also expressed support for HUD's proposal to require eligible properties to commit to a 20-year subsidy contract and use agreement.

A commenter stated that the current, available funding is only sufficient to provide for the continued viability and affordability of approximately 11 percent of the eligible senior housing and

strongly urged that additional funding be made available for this purpose in future years. Another commenter stated that in future fiscal years HUD should continue to seek additional appropriations to support the preservation, rehabilitation, and refinancing of the remaining inventory of unassisted Section 202 units.

Commenters expressed support for the proposal to administer SPRAC awards in HUD's Washington, DC Headquarters, out of concern about the sufficiency of available funds and available qualified field staff for the application process to be handled by field offices.

Although largely supportive of the proposed SPRAC award process, commenters also submitted recommended changes. The following section presents the key issues raised by the commenters and HUD's responses.

## **B. Specific Comments**

### **1. The Award Process**

Comment: A commenter recommended that HUD consider an award category that recognizes the characteristics of the residents residing in units eligible under SPRAC. The commenter stated that units that are eligible are occupied by persons who have very high supportive service needs, and, in some cases, are the hardest to serve. The commenter said that the increased demand on services, increased costs for operating the development, and the additional costs for supportive housing, may suggest that properties that show a high population of the hardest to serve should receive additional priority. The commenter stated that, to further preserve the affordable housing stock and expand opportunities to unassisted units in SPRAC-eligible developments, HUD should give preference to projects that are a high priority for the local community. The commenter stated that the high priority would be demonstrated by a significant investment of federal, state, local and/or philanthropic funds to the property as part of a collaborative funding and/or

stabilization effort.

HUD Response: In order to ensure that SPRAC tenants have access to the supportive services and other amenities they need, SPRAC eligibility criteria under this final Notice include the requirement that the property is proximate to, or otherwise arranges for the availability of amenities and services needed by property tenants. Furthermore, as provided in the January 8, 2013, advance Notice, SPRAC assistance may provide revenue that could offset the cost of a supportive services coordinator or other operating costs.

The SPRAC award is an operating subsidy based on market rents, so additional investment from federal, state, local and/or philanthropic funds will not affect the amount of the SPRAC award. In order to ensure projects that have the most need are prioritized, the SPRAC award process prioritizes those properties making a commitment to serve, or continue to serve very low-income tenants, giving additional priority to the proposed rehabilitation standard, as well as maturity date, in order to provide a resource for properties that will lose their affordability use agreement soonest. Because projects are required to complete a basic level of rehabilitation, it is likely that many Owner-Applicants will seek to leverage additional funding sources to make transactions viable, therefore a separate incentive for public leverage is not necessary.

Comment: A commenter stated that HUD should consider restricting property eligibility to those properties with a significant percentage (e.g., greater than 50 percent) of unassisted units. The commenter said that this would focus resources on properties with highest needs.

HUD Response: As noted in the response to the preceding comment, to ensure projects that have the most need are prioritized, the SPRAC award process prioritizes according to those properties making a commitment to very low-income tenants, giving additional priority by proposed rehabilitation standard, as well as maturity date, in order to provide a resource for properties that

will lose their affordability use agreement soonest. A property's percentage of unassisted units will not be used by HUD for purposes of determining program eligibility or the total size of the SPRAC award. Furthermore, the vast majority of the properties eligible for SPRAC are those where more than 50 percent of the units are unassisted.

Comment: A commenter stated that the January 8, 2013, advance Notice indicated that there would likely be more than one subsidy contract on a property: one for the Section 8 subsidized units and one for the SPRAC units (the non-Section 8/unassisted units). The commenter requested clarification on coordination of contract expiration and renewal dates, asking whether (1) each contract would be aligned using amended contract language allowing the two contracts to run coterminous, or (2) the language in the Section 8 housing assistance payments (HAP) contract would be amended or revised to address both types of subsidy into one combined contract?

HUD Response: Eligibility to receive a SPRAC award is premised in part upon the owner's successful application to prepay the existing 202 mortgage on the property, as well as the subsequent 20-year renewal of the existing HAP contract, where applicable. This process requires a termination and renewal with a preservation exhibit, adding the currently remaining years on the HAP contract to the new 20-year contract. Due to legal distinctions between the SPRAC and HAP programs, HUD is not able to consolidate (combine) the existing Section 8 HAP Contract with the SPRAC. However, under the SPRAC Program, the owner's renewed HAP contract and new SPRAC award will run coterminously.

## **2. Notification-to-Proceed Letter**

Comment: Commenters requested a change to the length of time in which the Notification-to-Proceed letter would be valid. These commenters requested that the length of time be extended from 180 days, as provided in the proposed notice, to 270 days. The commenters stated that they

recognize that there are extensions potentially available for projects refinancing with HUD-insured mortgages or with low-income housing tax credits (LIHTCs). These commenters stated that they believed that potential lenders would be less hesitant to take on projects with this new type of HUD subsidy if the initial time period were extended to better match up with the FHA timeline, and it would leave owners less reliant on needing an extension.

HUD Response: *Change made in final Notice.* HUD agrees to change the length of time during which the Notification-to-Proceed Letter is valid for from 180 to 240 calendar days (not including any amount of time HUD will need to process applications). This change balances the need for the expedient obligation of SPRAC funds with the commenter's desire for a lengthened time frame that is more accommodating of the timing for financial transactions. Upon notification of HUD's approval of the prepayment application, applicants will have up to 180 additional calendar days to close on the proposed refinancing and to prepay their current 202 direct loan. Additional information regarding the potential impact that tax credit applications and award dates may have on the ability of any given applicant to meet these deadlines is discussed separately under Section 6/Low-Income Housing Tax Credits of this final Notice, below.

**Note** that, other project considerations notwithstanding, neither properties with mortgage maturity dates that predate the SPRAC application deadline, nor properties with mortgage maturity dates that are within 60 days following **July 3, 2013**, will be eligible for SPRAC awards. Furthermore, any Owner-Applicant who receives a Notification to Proceed Letter from HUD must successfully close on the refinance of the applicable Section 202 Direct Loan **BEFORE** the Section 202 Direct Loan mortgage maturity date in order for the subject property to remain eligible for SPRAC assistance. This approach allows HUD to meet the statutory intent to

protect unassisted tenants from displacement by targeting program assistance to those properties with imminent mortgage maturity dates.

### **3. Income Eligibility**

Comment: Commenters stated that 100 percent of the unassisted units of a qualified property, rather than those at 80 percent of the average median income (AMI), or lower, should be eligible for SPRACs, regardless of the annual income of the current tenant household. The commenters suggested that when those with incomes who do not qualify leave the property, they will be replaced with a 50 percent AMI or lower-income residents, who will then be qualified to receive SPRAC. Commenters stated that this practice will allow SPRAC to benefit the neediest residents over time and take the fullest advantage of SPRAC.

HUD Response: The legal authority granted to HUD in the Section 202 of 2010 Act requires HUD to provide project-based rental assistance “under the same rules . . . [as] under section 8 of the United States Housing Act of 1937 . . . or under the rules of such assistance as may be made available for the project.” Because HUD intends to model the SPRAC program after HUD’s Section 8 program, certain income restrictions must be applied to the SPRAC units. Tenants of unassisted units who do not meet the income restrictions at the time of prepayment of the Owner’s Section 202 Direct Loan are statutorily ineligible for SPRAC assistance.

Comment: A commenter asked for clarification or consideration of allowing tenants earning up to 80 percent of AMI to be counted as income eligible if their rents would increase dramatically under a SPRAC. The commenter stated that this would allow some units to remain available to the 60-80 percent households at the same time while committing to restrict all of the SPRAC units to below 50 percent households going forward.

HUD Response: HUD agrees that current tenants residing in unassisted units and who meet

the 80 percent AMI low-income threshold, as determined by HUD, qualify as income-eligible for SPRAC. HUD also agrees with prioritizing properties that commit to making SPRAC-assisted units exclusively available to tenants with 50 percent AMI at unit turnover. These two positions were reflected in the advance Notice and are not changed by this final Notice.

Comment: Commenters supported the proposal for priority consideration for owner/purchaser applicants who commit to targeting very low-income (50 percent of area median income or below) tenants for future vacancies, and a separate eligibility pool for applications serving seniors with higher incomes.

HUD Response: HUD agrees that properties should be prioritized based upon the Owner-Applicant's commitment to make SPRAC-assisted units exclusively available to tenants with 50 percent AMI at unit turnover. This final Notice describes a multi-tiered application evaluation and ranking system based on an Owner-Applicant's commitment to housing very low-income versus low-income tenants at move-in, with ranking criteria as follows:

1. Properties that commit to serving very low-income tenants and to completing substantial rehabilitation.
2. Properties that commit to serving very low-income tenants and to completing capital repairs.
3. Properties that commit to serving low-income tenants and to completing substantial rehabilitation.
4. Properties that commit to serving low-income tenants and to completing capital repairs.

Comment: A commenter stated that, given the scarcity of available subsidy, along with the compelling need for and the uncertainty with regard to future funding, HUD should only award

SPRACs to those properties for which the Owner-Applicant agrees to make their best efforts to reserve turnover units for very low-income seniors. The commenter stated that once these higher threshold criteria are satisfied, the commenter would support the proposed allocation of SPRAC resources in order of the property's original Section 202 financing maturity date until all available funds are awarded. Another commenter stated that, in light of the compelling needs of very low-income seniors, SPRAC funding should be used only for those properties for which the owner agrees to give first occupancy priority for turnover units to very low-income seniors.

HUD Response: As stated in response to the preceding comment, HUD agrees that it will prioritize applications submitted Owner-Applicants who commit to housing very low-income tenants. HUD submits that the multi-tiered application evaluation system based on commitment to housing very low-income vs. low-income tenants at move-in, as described in this final Notice, properly targets properties that commit to serving very low-income tenants, and awards those that make the low-income commitment only if there are more than enough funds to award all the owners who make a commitment to serve very low-income tenants under both substantial rehabilitation and capital repairs projects.

Comment: A commenter submitted comments in response to Questions #1 and #2, posed under Eligibility Criteria, in the January 8, 2013, notice. (See 78 FR 1225.) The commenter supported prioritizing developments that will serve existing low- and very low-income residents, and recommended that there be additional criteria with regards to income eligibility for SPRAC assistance, and that the addition of such criteria would allow the very lowest income residents of 202 financed properties to retain their housing. The commenter recommended adding criteria for what would become the highest priority pool and that this pool would be for projects that agree to use SPRAC assistance for existing extremely low-income (under 30 percent AMI), and very low-

income residents (50 percent AMI), currently residing at the property—rather than for very low- and low-income residents. Additionally, this pool would also be limited to projects that will also agree to house individuals with extremely low incomes (at or below 30 percent of AMI) in a minimum of 20 percent of the project units going forward.

HUD Response: This subset of 202 Direct Loan properties was initially targeted for moderate-income individuals. Under this final Notice, HUD has made a commitment to prioritize SPRAC assistance for very low-income tenants, and HUD’s estimations indicate that this meets the market need. Properties with extremely low- and very-low income tenants currently residing in unassisted units are eligible for SPRAC. Furthermore, those Owner-Applicants who make a commitment to make SPRAC units available exclusively to very low-income tenants at move-in will be prioritized in the first tier of ranked applications, so long as such applications also meet the mortgage maturity date threshold and all other program eligibility criteria as described under this final Notice.

Comment: A commenter stated that the advance notice does not list the eligibility for Loan Management Set Aside (LMSA) properties. The commenter requested clarification as to whether or not the notice will apply to LMSA properties, including those with LMSA contracts.

HUD Response: All pre-1974 202 Direct Loan properties with unassisted units that meet the eligibility criteria are eligible to apply for SPRAC, regardless of other types of subsidy the property does or does not otherwise receive.

#### **4. Substantial Rehabilitation**

Comment: A commenter requested that the stated amount of proposed repairs should rise to the level of substantial rehabilitation, and HUD should include as eligible projects those projects seeking to refinance through a section 223(f) loan (section 223(f) of the National Housing Act).

The commenter stated that projects looking to make “heavy” repairs, as needed, based on the project’s current condition should be eligible for SPRAC funds. The commenter also stated that owners that have maintained the property in good condition and cannot rise to the level of substantial rehabilitation will also need to provide current tenants with protection from displacement.

HUD Response: *Change made in final Notice.* The SPRAC program targets assistance to Section 202 properties at the greatest risk of displacing existing low-income tenants, and gives first priority to those applications that commit to serving very low-income tenants.

Under this final Notice, HUD acknowledges that substantial rehabilitation work is not always necessary in order to address the needs and requirements to maintain the property as quality affordable housing over the term of the new SPRAC, or to incorporate all of the repair needs identified under an Owner-Applicant’s Property Capital Needs Assessment (PCNA) report. Owner-Applicants who intend to fund a capital repair program for their properties, as opposed to a substantial rehabilitation project, remain eligible to apply for assistance under this SPRAC notice, irrespective of whether the capital repair work will be financed through a section 223(f) loan or any other public or private construction finance product. As a matter of policy, HUD defines "capital repairs" as a scope of proposed repairs that are no less than the needs and requirements identified in the Owner-Applicant’s PCNA report (up to, but neither reaching nor exceeding, substantial rehabilitation limits). “Substantial rehabilitation” is defined per the HUD *Multifamily Accelerated Processing (MAP) Guide, 4430-G, Rev-1*.<sup>1</sup>

## **5. Mortgage Maturity Date**

Comment: A commenter expressed concern about language in the advance notice stating

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<sup>1</sup> The MAP Guide may be accessed at the following URL:  
[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/hudclips/guidebooks/hsg-GB4430](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/guidebooks/hsg-GB4430)

that HUD will award SPRAC funding in chronological order of mortgage maturity date. The commenter stated that the allocation of SPRAC funds should not be based solely on mortgage maturity date; rather, complete applications that can be filed more quickly with HUD, and projects with healthy operations and services provided to tenants should also be given priority.

HUD Response: *Change made in final Notice.* One of HUD's primary objectives under this final Notice is to give equal priority to all properties with (1) the potential to lose their ability to provide affordable housing, thereby increasing the chance of displacement of existing tenants, and (2) those committed to serving, as well as continuing to serve, very low-income tenants. HUD submits that properties which are selected by the Department to receive a SPRAC award will have been found to have strong organizational capacity. This consideration has been added to the Award Process criteria, as addressed in the Owner-Applicant SPRAC Eligibility Criteria section of this final Notice.

Comment: Commenters suggested that properties that were eligible for SPRAC awards on the date of enactment of the Section 202 Act of 2010, January 4, 2011, remain eligible for SPRAC awards even if the properties have already completed a prepayment transaction or reached maturity since January 4, 2011. Commenters stated that properties that are refinanced after the enactment of the Section 202 Act of 2010 are eligible for SPRAC awards, since such award, according to the commenters, is consistent with the statute, which provides that the award "in connection with a prepayment plan for (the) project" and is also necessary to prevent further displacement and protect affordability for future very low-income residents. (See Public Law 111-372 at 124 Stat. 4081.)

A commenter said that in the case of properties with Section 202 mortgages that matured after the date of enactment of the Section 202 Act of 2010, many owners have made their best efforts to recapitalize their properties and, to the extent possible without rental assistance, preserve

the affordability of the property. The commenter stated that, in most cases, recapitalizing the property required new debt and higher rents, and for units without rental assistance these rent increases imposed hardship on existing tenants and may even have led to displacement of very low-income residents.

Commenters stated that retrospective award of SPRACs for properties that would otherwise experience resident displacement or lack of access for lower income individuals is essential to preserving the long-term affordability of the units within the context of recapitalization, and is consistent with the statute's provision for projects "otherwise approved by the Secretary to prevent displacement of elderly residents in the case of...recapitalization and to further preservation and affordability." Commenters stated that there are many examples of properties that have refinanced their Section 202 loans subject to HUD approval because the physical needs of the property required "immediate attention." Commenters stated that owners refinanced and recapitalized their properties to meet chronic physical needs and tried to preserve affordability by minimizing rent increases on very low-income senior tenants or resulting displacement, but such recapitalization typically required rent increases for unassisted units, jeopardizing the long-term affordability of these units for very low-income seniors. Commenters further stated that even if a property has not yet recapitalized, the statutory language supports the position that an intervening maturity should not alone disqualify a recent Section 202 property from seeking or obtaining a SPRAC, so long as the property meets the other statutory and guidance criteria.

A commenter expressed concern that properties with (1) mortgage maturity dates that predate the SPRAC application deadline, and (2) maturity dates sooner than 60 days following the SPRAC application deadline will not be eligible for SPRAC award. The commenter recommended that HUD consider SPRAC awards for all properties otherwise eligible for consideration under

SPRAC regardless of their mortgage maturity date (matured or set to mature), as long as the HAP contract is in place, and the property owner commits to providing long term affordable housing.

Other commenters stated that properties that do not receive SPRAC awards under this funding round should be eligible to apply for future SPRAC funding. The commenters stated that this would allow other properties to move ahead with immediately needed repairs and/or transfers now without forfeiting their ability to seek SPRAC later to preserve and maintain the affordability if additional resources become available.

HUD Response: HUD has interpreted section 201 of the Section 202 Act of 2010 to mean that any project for which the Owner has previously prepaid the Section 202 Direct Loan, or with a Section 202 Direct Loan that has previously matured is not eligible for a SPRAC. The prepayment authority of the Section 202 Act of 2010 states that SPRAC may be awarded “in conjunction with a Section 202 Direct Loan prepayment plan, or as otherwise approved by the Secretary,” however, for a project to receive a SPRAC award, it must currently qualify as a Section 202 Direct Loan project. Any project where the Section 202 Direct Loan has been previously prepaid, or has otherwise matured, no longer legally qualifies as a Section 202 project. As a result, the SPRAC authorization of section 204 of the 2010 Act has no applicability to these projects. (See Public Law 111-372 at 124 Stat. 4079.) If a property is not awarded SPRAC funds, for whatever reason, the unassisted tenants residing at the property may be eligible for tenant protection vouchers (TPVs). Please refer to PIH Notice 2013-08<sup>2</sup> and Housing Notice 2012-03<sup>3</sup> for further guidance.

Comment: A commenter stated that HUD’s proposed application selection process would

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<sup>2</sup> PIH Notice 2013-08, “Funding for Tenant-Protection Vouchers for Certain At-Risk Households in Low-Vacancy Areas – Final Implementation” (<http://portal.hud.gov/hudportal/documents/huddoc?id=13-08pihn.pdf>)

<sup>3</sup> Housing Notice 2012-03, “Guidance on Eligibility for Tenant Protection Vouchers Following Certain Housing Conversion Actions” (<http://portal.hud.gov/hudportal/documents/huddoc?id=12-03hsgn.pdf>)

rank SPRAC applications meeting basic program criteria by maturity date, and stated that the significance attached to mortgage maturity date could deny SPRAC assistance to projects with later maturity dates but that have urgent repair needs and could better leverage limited SPRAC resources. The commenter stated that HUD should impose additional requirements for SPRAC eligibility, including the owner/purchaser capacity discussed above.

HUD Response: Per HUD's interpretation of section 201 of the Section 202 Act of 2010 (see above), a Section 202 project's mortgage maturity date constitutes the primary threat to the project's ongoing affordability, due to the likelihood that this may result in the displacement of existing tenants. Therefore, HUD will continue to use this date as a criterion for ranking eligible applications submitted under this final Notice. However, HUD recognizes that the mortgage maturity date and its associated Section 202 Direct Loan affordability use agreement are not the only risks to the long term viability of a project and its unassisted tenants. For this reason, properties that serve and/or will continue or commit to serving very low-income tenants and that also have the greatest rehabilitation needs (re: "substantial rehabilitation") will be ranked under the top tier of eligible applications under this final Notice, which now includes additional criteria related to owner/purchaser capacity.

Comment: A commenter stated that the January 8, 2013, advance Notice was not clear concerning how HUD will prioritize and review eligible Section 202 properties that were built in phases when one phase has an earlier mortgage maturity than the other. The commenter raised the example of its own two Section 202 properties that were built in phases, 1964 and 1968. The commenter stated that while the properties have two separate Section 202 mortgages, the properties share walls, common hallways, the same roof, the same parking lot, the same heating, ventilation and air conditioning (HVAC) and hot water delivery systems, a common management office,

common laundry facilities, and are both located on one legal parcel of land. The commenter stated that, in essence, the phases are one property. The commenter requested that HUD incorporate language in this final Notice, which addresses phased projects, particularly for properties which cannot be feasibly separated and preserved as two or more separate phases.

HUD Response: *Change made in final Notice.* This final Notice is revised to reflect that if a property was built in multiple phases, when those various phases share major systems, the phases will be considered one property. The earliest of the Section 202 mortgages associated with those phases will be used to establish the mortgage maturity date for purposes of the SPRAC program.

## **6. Low-Income Housing Tax Credits (LIHTC)**

Comment: A commenter stated that most or all of the properties eligible for SPRAC could also benefit from 9 percent tax credit equity, but strong competition in most states will make it difficult to predict whether a particular property will receive an award. The commenter suggested that an applicant be given the option of submitting rehabilitation plans both with and without 9 percent credits. Another commenter requested that if a property receives a SPRAC award based on its tax credit award proposal but does not receive a 9 percent award, the property should still be able to receive the SPRAC award based on its plan without tax credits if that plan meets eligibility criteria.

HUD Response: *Change made in final Notice.* The SPRAC award process will allow properties that apply with contemplated tax credit equity (re: applications for either 4 percent or 9 percent tax credits) to continue to be eligible for a SPRAC award while the tax credit announcement is pending, or in cases where the Owner-Applicant is waiting for the state to open the next scheduled LIHTC application period. The Owner-Applicant's original SPRAC application should include only one prepayment financing plan reflecting the inclusion of the tax credit equity. In the

event that the Owner-Applicant applies and is approved for a 9 percent LIHTC award, the Owner-Applicant will have up to 180 calendar days from the date of the LIHTC award announcement to close on financing. In the event that an Owner applies and is not approved for a 9 percent LIHTC award, HUD will provide each such Owner-Applicant with up to 60 additional calendar days from the date of the LIHTC notification to complete and submit a revised Section 202 prepayment financing plan. The Owner-Applicant's revised financing plan can include information about the use of 4 percent tax credit equity in each case where the applicant seeks to secure this form of project capital in place of the 9 percent credits **so long as** the applicant pursues the 4 percent credits under the first available funding round. However, please note that **HUD will not accept** any revised financing plan that reflects the applicant's intention to reapply for 9 percent tax credits. Regardless of whether tax credits will or will not be used to finance the proposed project, the Owner-Applicant's financing plan must include a detailed sources and uses statement (and a newly-revised RCS is also required if the addition, or lack thereof, of tax credit financing results in any substantial change to the project scope of work). Once HUD has completed its review of the Owner-Applicant's financing plan and upon approval of the plan, the applicant will have up to 60 calendar days to close on financing. In cases where a pending 4 percent tax credit award requires additional time, the Owner-Applicant's request for an extension to this 60 day requirement will be considered by HUD.

**Note** that, other project considerations notwithstanding, neither properties with mortgage maturity dates that predate the SPRAC application deadline, nor properties with mortgage maturity dates that are within 60 days following **July 3, 2013**, will be eligible for SPRAC awards. Furthermore, any Owner-Applicant who receives a Notification to Proceed Letter from HUD must successfully close on the refinance of the applicable Section 202 Direct Loan

BEFORE the Section 202 Direct Loan mortgage maturity date in order for the subject property to remain eligible for SPRAC assistance. This approach allows HUD to meet the statutory intent to protect unassisted tenants from displacement by targeting program assistance to those properties with imminent mortgage maturity dates.

Comment: A commenter expressed concerns with the financing requirement under the eligibility criteria in the January 8, 2013, advance Notice, which stated that the Owner-Applicant must intend to refinance under the terms and conditions of the American Homeownership and Economic Opportunity Act of 2000 (12 U.S.C. 1701q note), as amended, with no anticipated debt service savings from the refinance. The commenter stated that since tax credit financing is the key tool to accomplish a significant rehabilitation of older Section 202 financed properties, the regulations of the LIHTC program must be followed, and the project must be structured to attract an investor. The commenter has found that possible syndicators will not invest in a property as long as the property is paying amortizing debt, and therefore, the current financing structure includes paying off the amortizing Section 202 mortgage. The commenter recommended that SPRAC eligibility criteria include projects experiencing a decrease in or elimination of amortizing debt payments as a result of refinancing.

HUD Response: *Change made in final Notice.* Under this final Notice, HUD will strike language indicating that the SPRAC program requires that the 202 Owner-Applicant anticipates no debt service savings from the refinance. The SPRAC statute does not indicate that a property owner must demonstrate an increase in the property's debt service in order to be eligible for program assistance. Only those Section 202 properties with pre-1974 mortgage origination dates and an interest rate of 6 percent or less are eligible to receive SPRAC assistance.

Comment: A commenter stated that HUD should evaluate whether and how to encourage

Owner-Applicants to utilize 4 percent or 9 percent tax credits, which could often reduce the amount of SPRAC assistance necessary by reducing the rehab debt service burden. The commenter said that this would stretch scarce SPRAC resources. The commenter stated that there may be strong reasons why leveraging tax credits should not be required or preferred in the application process, but HUD should consider the issue. This commenter stated that when tax credits are utilized, HUD should also consider whether SPRAC rents should be set at new budget-based levels (capped at market rents), in order to further spread the available SPRAC resource.

HUD Response: The SPRAC award process prioritizes properties: (1) with the potential to lose their ability to provide affordable housing, which increases the possible displacement of existing tenants; (2) that serve and/or will continue or commit to serving very low-income tenants; and (3) that have the greatest rehabilitation needs (“substantial rehabilitation”). For these reasons, HUD will not also prioritize Owner-Applicants receiving a LIHTC award. The SPRAC rent-setting process will be based upon that used to calculate initial rents for Section 8 Mark-Up-to-Market properties. HUD will approve initial project rents set based on the lesser of the following, per Option One of the Section 8 Renewal Policy Guidebook<sup>4</sup>:

- The rents justified under the owner’s RCS rents; or
- 150 percent of the applicable HUD fair market rents (FMRs).

**NOTE:** One important distinction between rent-setting policy under a SPRAC and that for Mark-Up-to-Market is that HUD will consider post-rehab rents for SPRAC units, where this is prohibited under Mark-Up-to-Market. See pp. 67-68 of this final Notice for additional guidance.

## **7. Sponsor Capacity**

Comment: Commenters stated that the process proposed in the January 8, 2013, advance

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<sup>4</sup> The Section 8 Renewal Policy Guidebook may be accessed at the following URL:  
[http://portal.hud.gov/hudportal/documents/huddoc?id=Sec\\_8\\_Renewal\\_Policy\\_Guide.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=Sec_8_Renewal_Policy_Guide.pdf).

Notice would not facilitate or acknowledge the role of strong nonprofits in acquiring and preserving properties that are in disrepair and their commitment to long-term, responsible ownership. The commenters stated that, on the other hand, some current Section 202 owners lack the capacity for managing the refinancing and rehabilitation of these properties, and some prospective purchasers may themselves have limited experience and capacity with the challenges inherent in Section 202 refinancing and renovation. The commenters stated that, given the significance and scarcity of SPRAC resources, HUD should regard the development and management capacity of the owner (existing or new) as a critical element of the SPRAC application and award process. The commenters stated that HUD should make SPRAC awards only to owner/purchaser applicants with experience in successfully renovating, owning, and sustainably managing HUD-assisted properties (as evidenced by Active Partners Performance System (APPS) data or other objective record of experience with HUD-assisted properties), and with tax credit experience if tax credits are proposed in the refinancing. The commenters stated that appropriate entities would include owners that utilize the services of appropriate property management companies. Similarly, a commenter stated that HUD should ensure SPRAC awards are limited to those nonprofit owners or purchasers that are capable of executing the recapitalization of the property in the context of a commitment to the long-term preservation of affordability.

HUD Response: *Change made in final Notice.* HUD agrees that the capacity of the Owner-Applicant (or purchaser) should be an eligibility criterion for receiving a SPRAC award. A capable owner is the key to the successful management of a project over the course of the SPRAC. A strong development team is an integral component of a successful recapitalization transaction, particularly when the transaction involves substantial rehabilitation and the integration of multiple sources of financing. In accordance with the criteria specified under recent Departmental directives, Owner-

Applicants (or purchasers) will be required to include a narrative with their prepayment application package describing the Development Team's capacity, including in renovating, owning, and managing HUD assisted properties, and with tax credits if tax credits are proposed in refinancing. HUD will carefully evaluate each project and transaction to ensure owner capacity meets appropriate agency standards. Per the Owner-Applicant SPRAC Eligibility Criteria section of this final Notice, each Owner-Applicant must provide the following information:

- The names of its proposed development team members;
- Documentation demonstrating, as applicable, the team's recent successful experience financing, developing, rehabilitating, constructing, owning, and operating properties or projects that are substantially similar to the project described under the SPRAC application;
- A description of the teaming partner relationships;
- A resume for each proposed team member; and
- If multiple sources of financing have been identified for the proposed project, documentation demonstrating that the development team has experience with at least three transactions involving each form of financing for the proposed project.

HUD reserves the right to require changes in the membership of any Owner-Applicant's or purchaser's Development Team to ensure a high level of owner capacity, prior to prepayment approval.

## **8. Property Conditions**

Comment: Commenters stated that many of the properties in Section 202 portfolios are old and have not had access to adequate resources to make repairs or improvements without burdening tenants. A commenter stated that eligibility criteria 2, 3, and 4 (relating to inspections by HUD's Real Estate Assessment Center (REAC), management and occupancy review (MOR) scores, and lack of HUD's Departmental Enforcement Center (DEC) open referrals) in the January 8, 2013,

advance Notice should not in and of themselves serve as threshold criteria for program eligibility. Another commenter similarly stated that an Owner-Applicant's failure to initially meet any of these prior performance eligibility criteria should not be sufficient reason to bar eligibility for program funds altogether.

These commenters also stated that the SPRAC application can be used to explain how a SPRAC award will facilitate needed rehabilitation and overcome the existing deficiencies, particularly if there is a transfer in ownership to a more capable owner. The commenters stated that HUD should not restrict applications based upon these criteria but should allow and actively encourage applications where either the current Owner-Applicant or a proposed preservation purchaser has a viable plan for using new SPRAC resources to facilitate necessary rehabilitation and management changes.

HUD Response: *Change made in final Notice.* HUD seeks to encourage applications where the owner or a preservation purchaser has a viable plan for using new SPRAC resources to facilitate necessary rehabilitation and management changes. In this final Notice, HUD describes exceptions it will make to the REAC, MOR, and DEC thresholds in certain cases. HUD will consider exceptions to the REAC threshold if either the Owner-Applicant or purchaser has a plan in place to obtain financing to address physical needs of property. Documentation of such plan must be submitted by the Owner-Applicant at time of the initial SPRAC application, and full compliance must be documented at time of prepayment application according to the standards described by HUD under this final Notice. HUD will consider exceptions to the MOR threshold if either the Owner-Applicant or purchaser has a plan in place to replace the management agent or take other corrective actions. Documentation of such plan must be submitted by the Owner-Applicant at time of the initial SPRAC application according to the standards described by HUD under this final

Notice. Documented evidence that the Owner-Applicant has taken the necessary corrective actions to address the MOR issues must be included as a part of the Owner-Applicant's Section 202 Direct Loan prepayment application package. HUD will consider exceptions to the DEC threshold if either the Owner-Applicant or purchaser has a plan in place to address open DEC findings. Documentation of such plan must be submitted by the Owner-Applicant at time of the initial SPRAC application according to the standards described by HUD under this final Notice. All open DEC findings must be cleared prior to prepayment approval, which must be documented at time of prepayment application according to the standards described by HUD under this final Notice.

Comment: A commenter recommended that HUD consider the use of a PCNA similar to what is required for HUD-insured programs, in addition to the REAC score.

HUD Response: HUD seeks to minimize up-front program participation costs to Owner-Applicants and therefore only requires that a completed PCNA be submitted as a part of the prepayment application, once Owner-Applicants have received a Notification-to-Proceed from HUD. At this point, the PCNA will be used by HUD to fully evaluate the project. In order to satisfy the PCNA requirements of the 202 prepayment application, Owner-Applicants will have the option of submitting a completed "green" PCNA (re: a HUD RAD SOW<sup>5</sup> or a RAD PCA<sup>6</sup>), as may be modified to specifically meet the requirements of SPRAC, or a substantially-equivalent standard with the prior written approval of HUD, and which contains a Green Building component. Furthermore, properties that will only be rehabilitated to the standard of capital repairs are now eligible for SPRAC funds under this final Notice. HUD will use the Owner-Applicant's PCNA to establish the repair needs of the property for purpose of ranking each application under one of the

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<sup>5</sup> RAD Physical Condition Assessment Statement of Work:  
<http://portal.hud.gov/hudportal/documents/huddoc?id=RADPCAStatementofWork.pdf>

<sup>6</sup> RAD Property Capital Assessment Tool: <http://portal.hud.gov/hudportal/HUD/radpcaexceltool.xlsm>

four tiers, as described under this final Notice. Please note that HUD will not assign a higher rank to any Application where the Owner-Applicant's PCNA indicates a need for capital repairs, and where the Owner-Applicant commits to completing substantial rehabilitation. Likewise, HUD will not award SPRAC funds to any Owner-Applicant whose application proposes to complete capital repairs on the property, but whose PCNA indicates the need for substantial rehabilitation.

Comment: A commenter stated that the proposed requirement for proximity to amenities and services (eligibility criterion 7 in the January 8, 2013, advance Notice) may penalize properties that have worked out ways to import these benefits when they are not "proximate." The commenter stated that long-standing arrangements that have been satisfactory to HUD or that otherwise adequately meet resident needs should also be able to meet this criterion. The commenter stated that while an argument can be made for HUD to give weighted consideration to applications demonstrating proximity to effective and convenient services, HUD has not previously monitored Section 202 properties to ensure whether there is proximity to services and amenities, so a property should not be disqualified for this reason under the SPRAC Program.

HUD Response: *Change made in final Notice.* HUD agrees that long-standing arrangements that have been satisfactory to HUD and that otherwise adequately meet resident needs should also meet the proximity to amenities and services criterion. This final Notice provides applicants with the option to include documentation verifying that supportive services and other amenities for the 202 property have been or will be arranged for in the absence of direct or general proximity to such services in the neighborhood and surrounding community. This final Notice provides guidance as to the documentation that HUD will accept under this criterion in order for these to meet this threshold requirement.

## **9. Vacancy**

Comment: Commenters stated that a vacancy rate above 7 percent may arise from one or more causes and this should not itself be a cause for disqualification. The commenters stated that the vacancy could be the result of the difficulty in marketing older units at budget-based rents to fixed-income seniors (which the refinancing, rehabilitation, and SPRAC assistance are intended to address), or the vacancy rate could result from it being unmarketable or obsolete efficiency units, poor management, or lack of capital to provide the amenities that would attract seniors or provide proper maintenance. One of the commenters stated that, in other cases, an owner may consciously plan for vacancies to rise in order to ease the problems of tenant relocation and displacement during planned renovations. The commenters reiterated that the single fact that vacancy rates have risen above 7 percent should not prevent the property's residents from benefiting from SPRAC assistance if there is a viable plan to correct the problem, such as a preservation transfer.

A commenter stated that requiring Owner-Applicants to demonstrate that their properties had a vacancy rate of less than or equal to 7 percent for the previous 24-month period is too stringent a standard for program eligibility. The commenter's own property would not meet this requirement because it is located in a challenged, transitional neighborhood with an over 50 percent poverty rate, but that through strict and efficient management, the commenter has maintained an environment of safe, decent housing. This same commenter stated that the factors contributing to the property's high rate of vacancy include: (1) location of the project in a census tract with an over 50 percent poverty rate; (2) the property serves persons who are extremely and very low-income and cannot always pay the unassisted unit rents; and (3) the smaller sized-units, older systems, as well as more limited common space than newly constructed facilities, limit the pool of applicants for the unassisted units.

Another commenter stated that the occupancy rate for its property has been increasing recently; that there is a commitment to housing long-term homeless persons; and that its site staff has been working closely with several social service agencies to identify individuals with group residential housing subsidies. The commenter that it has worked with the local HUD office to obtain a waiver to lease a limited number of units to persons between the ages of 50 and 61, and therefore, occupancy is now 94 percent, but that the property would still not qualify to apply for SPRAC assistance if this eligibility requirement remains in place under the final Notice.

This commenter and the preceding commenter requested that, for the reasons they each expressed, the eligibility criteria be flexible on vacancy rate for partially Section 8 assisted Section 202 units.

Another commenter stated that area-wide vacancy rates generally or in senior properties in particular should only be used for units that are comparable to what would be provided under the SPRAC program, which are decent and deeply assisted affordable units. The commenter recommended that once HUD has established sufficient threshold criteria to ensure that funding would be provided only to priority properties, HUD could consider a lottery among the pool of such eligible properties.

HUD Response: *Change made in final Notice.* HUD agrees that property-level vacancy rates are not the best indicator of whether a given property meets a demand for affordable housing for this class of properties. In this final Notice, HUD has revised the vacancy eligibility threshold, and now requires that subject properties must be located in a county that exhibits a higher rate of need for affordable elderly housing (“High Need”) than the 20<sup>th</sup> percentile of all elderly households. HUD defines this need as the percent of all households in a county with all of the following characteristics:

- Tenants/renters;
- Annual household income is less-than-or-equal-to 80 percent AMI, as determined by HUD and adjusted for household size;
- At least one current resident who is above the age of 62 years; and
- The household's residence exhibits any of the following housing problems, or any combination thereof:
  - Lack of sufficient plumbing or kitchen facilities; and/or
  - Overcrowding (re: more than one person per room); and/or
  - Rent Burden (re: household pays more than 30 percent of monthly income for rent).

A summary of all of the SPRAC-eligible counties is provided under Attachment 2 of this final Notice.

**NOTE:** While HUD has agreed to revise the vacancy rate eligibility criterion proposed under the advance Notice published on January 8, 2013, HUD maintains that an Owner-Applicant whose property is experiencing or has experienced a notably high rate of vacancy must address this issue to HUD's satisfaction for award consideration purposes. If either the property's current vacancy rate or its average vacancy rate for the 24-month period preceding the SPRAC application submission is greater than **10 percent**, the Owner-Applicant must provide HUD with a detailed explanation accounting for this, along with detailed information describing what actions the Owner-Applicant will take or is taking to mitigate this circumstance. HUD expects in many such cases, vacancies will likely be due to the un-marketability of one or more of the current unit types within the property. In turn, HUD expects that this will result in the

need for unit conversions in accordance with Housing Notice 2011-03<sup>7</sup>, or with any subsequent guidance as HUD may publish.

## **10. Timing of Awards**

Comment: A commenter stated that there are special considerations that must be made in cases where the transfer of property ownership is anticipated. This commenter stated that an unintended consequence of making conditional SPRAC awards that are not contingent upon a specific rehabilitation plan is that potential purchasers may tend to bid up the value of the property based on the SPRAC-enhanced future rental income stream. The commenter stated that given this dynamic, even the most responsible purchaser would be forced to dedicate more resources to property acquisition and would therefore have less capital available for property repairs, and that, in order to avoid this undesirable outcome, HUD should award the SPRAC only after the prepayment request is evaluated on both the merits of the recapitalization plan and the capacity of the proposed owner/purchaser. The commenter recommended that HUD require that if the current owner plans to sell the property, the prepayment request should include: (1) a property appraisal (based on existing affordability restrictions and without SPRAC); (2) a conditional commitment of the acquiring entity; (3) evidence of its development and management capacity; and (4) details about the planned rehabilitation. The commenter stated that, although it is not proposing a complete prepayment submission that would require incurring significant predevelopment costs, SPRAC application should include information about the property's physical needs, the proposed redevelopment plan, and the capacity of the owner/purchaser in detail sufficient for HUD to evaluate the proposal's

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<sup>7</sup>Housing Notice 2011-03, Policies and Procedures for the Conversion of Efficiency Units to One-Bedroom Units, can be accessed at the following URL: <http://portal.hud.gov/hudportal/documents/huddoc?id=11-03hsgn.pdf>. Although the policy outlined in this Housing Notice solely addresses the conversion of efficiency units into one-bedroom units, the Department will continue to consider conversion requests for other unit types on a case-by-case basis.

strength and viability.

Another commenter stated that where a transfer is anticipated, HUD should take steps to prevent the dilution of resources into acquisition at the expense of rehabilitation. The commenter stated that this could include, for example, awarding the actual SPRAC later in the process, while requiring the initial SPRAC application to include sufficient information on the property's physical needs and rehabilitation plan and the capacity of the applicant to evaluate the proposal's strength and viability.

HUD Response: HUD is not planning to regulate the sales price of properties and therefore will not collect an appraisal, but the prioritization of substantial rehabilitation remains a primary determinant for the selection of projects and the total amount of program funding that will be awarded to selected projects. As indicated earlier in this final Notice, HUD will consider development and management capacity as a threshold criterion for Owner-Applicants (or purchasers), which is separate and apart from HUD's evaluation of the proposed project's eligibility for a SPRAC award. Furthermore, Section 202 prepayment approval requires several steps that address this concern, including the following: (1) if the project is supported with a Section 8 contract, and there is a sale, the sale will necessitate the assignment of HAP Contract and HUD will review the qualifications of the new ownership in accordance with the Owner-Applicant SPRAC eligibility criteria specified under this final Notice; (2) where no debt service savings are anticipated as a result of the refinance, proceeds from the refinance must be used first to make the necessary repairs to the project, and then to maintain affordable rents for unassisted residents, before funds may be approved for any other uses described in this final Notice; (3) submission must include a time schedule for proposed repairs, and a description of the sources of funding to meet the physical needs of the project over the terms of the new Use Agreement; and (4) owners must

submit the mortgage and mortgage note, all tenant comments and the owner's evaluation, any other use agreements/restrictions, subordinate loans that may be in place, details of the proposed repairs/rehabilitation of the project (including the PCNA or plans and specifications), a detailed narrative justifying the future use of the rental assistance being provided to the project, and a description of the proposed use of the proceeds from the refinance, including a Sources and Uses statement.

## **11. Rent Comparability Study**

Comment: A commenter expressed concerns with the proposed rent comparability study requirements. The commenter requested clarification about rent comparability studies in circumstances where the rent comparability study is within its 5-year period, and asked whether or not the market rents would be adjusted by OCAF when eligible?

HUD Response: HUD has adopted certain specific Mark-Up-to-Market rent-setting standards for purposes of SPRAC, and will approve the lesser of the following as the initial property rents for each SPRAC property:

- The rents justified under the owner's RCS rents; or
- 150 percent of the applicable HUD fair market rents (FMRs).

Under SPRAC, HUD will require subsequent rent comparability studies to be performed by the owner every 5 years thereafter, according to the terms and conditions of the SPRAC. As with HUD's Mark-Up-to-Market rent-setting policies, HUD will commission an independent rent comparability study at time of the Owner-Applicant's prepayment application for comparison purposes under SPRAC.

Within the 5-year period between rent comparability studies, rents will be adjusted by the applicable Operating Cost Adjustment Factor, as established by HUD.

Comment: Commenters stated that some of the properties that would benefit from SPRAC assistance would not be eligible for Option 1: Mark-Up-to-Market. The commenters stated that the January 8, 2013, advance Notice proposed that properties have a REAC score of 60 or above, and that, in some cases, properties that have a physical condition score below 60 would greatly benefit from the stability of rental assistance for non-subsidized units that would allow additional capital improvements or repairs to take place which would bring the property up to minimum property standards. The commenters recommended that HUD reconsider the REAC Physical Condition score above 60 as a requirement for priority eligibility.

HUD Response: As noted in a response to an earlier comment, HUD will provide for exceptions to the REAC threshold if there is a plan in place to obtain financing to address the physical needs of the property, which must be documented at time of prepayment application by a PCNA and statement of work.

Comment: A commenter stated that non-Section 8 units are not currently covered under the existing Section 8 Contract Renewal Guidebook. The commenter stated that the provisions of this guidebook would have to be revised to meet the requirements proposed under the January 8, 2013, advance Notice, and that Mark-Up-to-Market eligibility requirements limit SPRAC eligibility to for-profit owners based on how the provisions of this advance notice are presented. The commenter stated that nonprofit owners of developments that would otherwise qualify under the provisions of the SPRAC notice would greatly benefit from additional rental assistance to further stabilize the property and provide much needed rental assistance to their non-subsidized residents. The commenter recommended that HUD expand eligibility for SPRACs to include nonprofit owners.

HUD Response: Nonprofit owners are eligible for SPRAC awards. The January 8, 2013, advance Notice referenced Mark-Up-to-Market to describe the rent-setting mechanism of SPRAC,

but Mark-Up-to-Market's eligibility restriction to for-profit owners does not apply to SPRAC property owners. Furthermore, the Section 8 Contract Renewal Policy Guidebook will be revised to specifically address non-Section 8 units and nonprofit owners of SPRAC-assisted properties by stipulating that the procedures for establishing unit rents under these specific projects are based upon the rent-setting standards described under Option 1A of the Renewal Guide.

Comment: A commenter stated that most properties built in the 1960s face challenges competing with more modern rental housing product, particularly Section 202 properties with very small, modest apartments that were built for cost efficiency. The commenter stated that primary property marketability challenges include: unit size; parking; debt capacity; and the availability of supportive services. The commenter stated that Section 202 facilities are an extremely important resource available to help households to live independently, and in order to effectively operate these properties and serve this population, Section 202 providers need resources to provide services from health and wellness to social activities to transportation and financial management. The commenter stated that when HUD started to combine Section 202 financing with rental assistance, the budget-based approach to rental assistance was developed to recognize the importance of these services and that, in some cases, above-market rents have been needed to ensure that property tenants have access to the supportive services that they need. The commenter stated that while HUD provides owners with the option to adjust the total number of units by combining small apartments to create larger apartments, the cost of such an approach in today's markets only further exacerbates the economic challenge. The commenter stated that the cost to combine apartments coupled with a net loss in revenue (two smaller apartments generate more rent than one larger sized apartment) renders this option economically infeasible. The commenter recommended that HUD consider setting SPRAC rents at a level that will account for the unique and important role that Section 202 units

provide in communities.

HUD Response: As noted in a response to an earlier comment, SPRAC rents will be set similarly to those for Section 8 Mark-Up-to-Market properties, and will be set based on market-comparable rents, consistent with current HUD policy direction. HUD submits that market rents will allow owners, asset managers, and development teams to properly repair and operate SPRAC properties.

## **12. Limited Dividends**

Comment: A commenter stated that the proposed limited dividend limited distribution requirements associated with SPRAC create a disincentive for owners to participate in SPRAC. The commenter stated that in 2011, the commenter undertook a financial analysis of its Section 202 properties, evaluating prepaying the mortgages in order to pursue the option of working with the local public housing authority to project-base all or some portion of the tenant protection vouchers that could be issued in association with the HUD 202 prepayment, and found that preservation of the property could be achieved at a cost of under \$50,000 per apartment. The commenter stated that this, however, would only be achievable if the rents could be set at 100 to 110 percent of the voucher payment standard, as opposed to the market rent. The commenter stated that this equates to a monthly rent of \$500 to \$550 per one bedroom apartment, utilities included. The commenter stated that while this is a very reasonable rental rate, it exceeds the determined market rents for this property by over \$150 per unit per month. The commenter stated that given how little it would cost to preserve the two Section 202 properties the commenter owns, it would seem that it should be easy to make the economics work to do so but that without HUD's reconsideration of the rents under SPRAC and elimination or increase of the limited dividend restriction, the commenter stated that it would be better served to wait until the mortgages mature and take the properties to market where

the commenter would be able to operate the properties with no rent restrictions, no age restrictions, and fewer reporting and administrative requirements.

HUD Response: Per the Section 202 prepayment notice,<sup>8</sup> if the Section 202 project is/will be owned by a for-profit limited partnership (meeting the statutory requirements in AHEO, as amended) and the Section 202 project has a Section 8 HAP contract that imposes a limitation on distributions, the Section 202 project Owner remains subject to the six percent annual distribution limitation. This distribution is authorized by HUD for FHA-insured as well as for conventional transactions. The maximum annual distribution from surplus cash is six percent of the total Owner's (purchaser's) equity that is paid at the refinancing of the project. Other government funds (i.e., HOME funds, CDBG funds, etc.) are not considered Owner's equity. LIHTC equity is not considered other government funds. LIHTC equity may qualify as Owner's equity, even if 100 percent of the LIHTC equity is not paid into the transaction on the date of the prepayment. The Developer Fee may qualify as Owner equity only if this Developer Fee is contributed as a source of funds for closing. No distributions will be permitted based on a deferred Developer Fee. HUD believes these benefits are substantial and will allow owners, asset managers, and development teams to properly repair and operate SPRAC properties.

### **III. SPRAC Application and Award Process**

#### **Purpose of the Program**

The purpose of the SPRAC Program is to prevent the displacement of existing income-eligible tenants of Section 202 Direct Loan properties with original interest rates of 6 percent or less, when the property is refinanced for the purpose of generating capital necessary to address property maintenance needs. HUD's portfolio of Section 202 Direct Loan properties includes

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<sup>8</sup> Housing Notice 2012-08, Updated Requirements for Prepayment and Refinance of Section 202 Direct Loans (<http://portal.hud.gov/hudportal/documents/huddoc?id=12-08hsgn.pdf>).

approximately 18,200 unassisted units; over the next decade an average of 2,000 unassisted units per year are at risk of expiring affordability due to maturing Section 202 loans.

SPRAC funds shall be awarded to support currently unassisted tenants who may be either Low-Income (80 percent of the applicable Area Median Income (AMI)) or Very Low-Income Families (50 percent AMI), as determined by HUD. For purposes of this final Notice, “current/existing tenant” means an Elderly Family as defined by 24 C.F.R. § 891.505, or any successor regulation promulgated by the Senior Preservation Rental Assistance Program, and may include “Handicapped Families,” as defined in 24 C.F.R. § 891.505, depending on the terms of the Owner’s original Section 202 Loan.

In addition to protecting existing tenants from displacement, SPRAC assistance is also intended to support the long-term preservation and affordability of these pre-1974 Section 202 Direct Loan projects. The mortgages on these properties, originally for 40- or 50-year terms, are reaching their maturity dates. When mortgages mature, the use and affordability restrictions of these properties expire, putting the long term affordability of this housing at risk. Very low-income tenants residing in the unassisted units of maturing mortgage properties are at the most immediate risk of displacement. The award process described in this final Notice will target these maturing mortgage properties by ranking qualified applications by mortgage maturity date. Neither properties with mortgage maturity dates that predate the SPRAC application deadline, nor properties with maturity dates within 60 days calendar days following the SPRAC application deadline (**September 3, 2013**) will be eligible for SPRAC awards. Moreover, this assistance may provide revenue that could offset the costs associated with employing a service coordinator and other associated operating costs. This assistance eliminates the need for Owners to impose rent increases on these vulnerable tenants to finance project costs.

If a property is not awarded SPRAC funds, for whatever reason, the unassisted tenants residing at such properties may be eligible for tenant protection vouchers (TPVs). Please refer to PIH Notice 2013-08 and Housing Notice 2012-03<sup>9</sup> for further guidance.

### **Program Description**

To qualify to receive a SPRAC award for unassisted units, the Owner-Applicant and the subject property must meet all SPRAC eligibility requirements, and all prepayment requirements under AHEO, as described under this final Notice.

HUD oversees a portfolio of approximately 200 Section 202 properties with original interest rates of six percent or less. All of these loans were financed prior to 1974. Many pre-1974 Section 202 Direct Loan properties have never completed a rehabilitation effort and are now in need of significant capital repairs. Owners may wish to prepay the existing Section 202 Direct Loan in order to obtain new financing to address the physical needs of the project. Even in a time of historically low interest rates, however, it is unlikely that the refinancing of an eligible Section 202 Direct Loan would result in a reduction in debt service.

HUD requires that as a condition of eligibility to receive SPRAC funds under this final Notice, selected Owner-Applicants must successfully close on the refinance of the current Section 202 Direct Loan before the loan's mortgage maturity date. HUD will make every possible effort to complete its application selection process and issue Notification to Proceed Letters as soon as possible so that all selected Owner-Applicants, and particularly those with imminent mortgage maturity dates, have as much time as possible to close on the mortgage refinance. If a selected Owner-Applicant's loan refinance does not close before the mortgage maturity date, for whatever reason, HUD shall rescind the award of SPRAC funds to any such

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<sup>9</sup> Housing Notice 2012-03, "Guidance on Eligibility for Tenant Protection Vouchers Following Certain Housing Conversion Actions" (<http://portal.hud.gov/hudportal/documents/huddoc?id=12-03hsgn.pdf>)

Owner-Applicant, in which case HUD, at its sole discretion, may award any such funds to another eligible Owner-Applicant who was not selected under the initial round of SPRAC awards.

For purposes of eligibility and consideration for a SPRAC award, HUD has also determined that the proposed repairs to the property may consist of either capital repairs or substantial rehabilitation. As a matter of policy, HUD defines "capital repairs" as a scope of proposed repairs that are no less than the needs and requirements identified in the Owner-Applicant's Property Capital Needs Assessment (PCNA) report (up to, but neither reaching nor exceeding, substantial rehabilitation limits). For purposes of this final Notice, "Substantial rehabilitation" has the same meaning as is defined under the HUD *Multifamily Accelerated Processing (MAP) Guide, 4430-G, Rev-1*. The prepayment of the Section 202 mortgage, in conjunction with the rehabilitation of the project and the provision of a SPRAC, will facilitate the improvement of the project and the long-term preservation of the project as affordable housing for both current and future tenants.

Assisting and promoting multifamily industry compliance with HUD and other federal accessibility requirements is a central element of HUD's fair housing mission. As such, HUD encourages the use of strong project design standards under this final Notice. Alterations financed in whole or in part with a SPRAC award under this final Notice, including both substantial rehabilitation and capital repairs, must comply with the Section 504 accessibility requirements described in 24 CFR part 8<sup>10</sup>, which defines accessibility requirements for all programs or activities receiving Federal financial assistance, including Federally assisted

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<sup>10</sup> 24 CFR Part 8: Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=5f27c29f1434159f7e214253d16b2c02&rgn=div5&view=text&node=24:1.1.1.1.8&idno=24#24:1.1.1.1.8.3.37.4>

multifamily housing. The Americans with Disabilities Act (ADA) also requires accessibility to public accommodations and commercial facilities, including any portions of multifamily properties which provide such accommodations or facilities.

The Owner-Applicant's or purchaser's preparation of a PCNA for purposes of applying for a SPRAC award is an opportunity to identify and remedy any instances of accessibility non-compliance, as well as to identify possibilities for additional accessibility options in the property that will allow an expanded number of tenants to "age in place" while maintaining an independent or semi-independent lifestyle. For further guidance on federal accessibility requirements, please refer to Housing Notice 2012-27<sup>11</sup>, specifically:

- Section IV, Repairs
- Section VI, Changes to PCNA Content
- Appendix 3, Section 504 – Assisted Housing and Urban Development
- Appendix 4, The Americans with Disabilities Act (ADA)
- Appendix 5, Accessible and/or Adaptable

SPRACs are not Section 8 project based rental assistance Housing Assistance Payment (HAP) contracts. However, pursuant to the 2010 Act, HUD has elected to administer SPRACs substantially under the same requirements governing project-based rental assistance made available under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1473f). Rental assistance provided under this final Notice will be administered in accordance with the specific terms and conditions enumerated under the Owner-Applicant's program contract with HUD ("Senior Preservation Rental Assistance Contract" (SPRAC)), including any related attachments and appendices, as applicable, until HUD publishes regulations to govern SPRACs in the near

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<sup>11</sup> Housing Notice 2012-27, Revised Requirements for Project Capital Needs Assessments, Estimated Reserves for Replacements and Remedies for Accessibility Deficiencies:  
<http://portal.hud.gov/hudportal/documents/huddoc?id=12-27hsgn.pdf>

future. To be eligible for SPRAC assistance, a tenant's annual household income must be at-or-below 80 percent of AMI ("low-income"), as determined by HUD. SPRAC assistance will only be provided to units occupied by income-eligible households at the time the SPRAC is executed. Initial SPRAC rents will be established based on the lesser of either:

- Comparable market rents, OR
- 150% of the Fair Market Rent, as determined by HUD.

Over the 20-year term of the SPRAC, contracts will be administered using the processes described in the HUD *Section 8 Renewal Policy Guidebook*<sup>12</sup> under Option 1A: Mark-Up-to-Market. After initial rent setting, rents shall be adjusted by an Operational Cost Adjustment Factor (OCAF) on the anniversary of each executed SPRAC. Per the guidance under FR-5664-N-01 ("Notice of Certain Operating Cost Adjustment Factors for 2013"<sup>13</sup>), "Section 514(e)(2) of MAHRA (42 U.S.C. 1437f note) requires HUD to establish guidelines for rent adjustments based on an OCAF. HUD has therefore developed a single factor to be applied uniformly to all projects utilizing OCAFs as the method by which renewal rents are established or adjusted." Under this final Notice, each SPRAC Administrator (as determined by HUD) shall conduct annual project rent adjustments according to the OCAF methodology prescribed under this Notice, until such time as it is superseded by subsequent guidance as HUD may publish. Participating Owners will be further required to prepare an updated Rent Comparability Study (RCS) every five (5) years during the course of the 20-year SPRAC term. As with HUD's Mark-Up-to-Market rent-setting

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<sup>12</sup> Section 8 Renewal Policy Guidebook:

[http://portal.hud.gov/hudportal/documents/huddoc?id=Sec\\_8\\_Renewal\\_Policy\\_Guide.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=Sec_8_Renewal_Policy_Guide.pdf).

<sup>13</sup> FR-5664-N-01, Notice of Certain Operating Cost Adjustment Factors for 2013:

<http://www.gpo.gov/fdsys/pkg/FR-2012-10-16/pdf/2012-25289.pdf>

policies, HUD will commission an independent rent comparability study at time of the Owner-Applicant's prepayment application for comparison purposes under SPRAC.

### **Available Funds**

The Consolidated and Further Continuing Appropriations Act, 2012 (Public Law 112-55, approved November 18, 2011) makes \$16 million available to fund the initial year of SPRAC awards for selected properties and units. HUD anticipates this could fund up to 2,000 unassisted units. Funding for future contract years is subject to appropriations authorized for this purpose. HUD may make new SPRAC awards in future funding rounds, in accordance with the requirements of this notice, as may be amended from time to time, if and when appropriations are authorized for this purpose.

### **Application Submissions**

HUD is only accepting electronic SPRAC application submissions under this round of program funding. Owner-Applicants who are interested in being considered for a SPRAC award must submit electronic/digital versions of all required application elements specified under this final Notice to the following HUD e-mail address: [SPRAC@hud.gov](mailto:SPRAC@hud.gov).

### **SPRAC Eligibility Criteria: Owner-Applicants**

In accordance with the criteria specified under recent Departmental directives, and in order to demonstrate their eligibility for a SPRAC award, Owner-Applicants will be required to include a narrative with their prepayment application submissions describing the Development Team's qualifications and overall capacity relevant to the renovation, ownership and management of HUD-assisted properties, as well as to tax credits if tax credits are proposed as a source of project financing. In order to evaluate whether the Owner-Applicant (or purchaser) is eligible to receive a SPRAC award, HUD will carefully evaluate each project and transaction to ensure that Owner-

Applicant' or purchaser's capacity meets appropriate agency standards. In order to address the criteria for this review, each Owner-Applicant must provide the following information as a part of the Section 202 prepayment application package:

- The names of the proposed development team members;
- Documentation demonstrating, as applicable, the team's recent successful experience financing, developing, rehabilitating, constructing, owning, and operating properties or projects that are substantially similar to the project described under the SPRAC application;
- A description of the teaming partner relationships;
- A resume for each proposed team member; and
- If multiple sources of financing have been identified for the proposed project, documentation demonstrating that the development team has experience with at least three transactions involving each form of financing for the proposed project.

HUD reserves the right to require changes in the membership of any applicant's Development Team to ensure a high level of Owner capacity, prior to prepayment approval.

#### Nondiscrimination

The Owner-Applicant is not eligible to request assistance if such Owner:

- i. has been charged with a systemic violation of the Fair Housing Act or received a cause determination from a substantially-equivalent state or local fair housing agency concerning a systemic violation of a substantially equivalent state or local fair housing law proscribing discrimination because of race, color, religion, sex, national origin, disability or familial status;
- ii. is a defendant in a Fair Housing Act lawsuit filed by the Department of Justice alleging a pattern or practice of discrimination or denial of rights to a group of persons raising an issue of general public interest pursuant to 42 U.S.C. 3614(a);

- iii. has received a letter of findings identifying systemic noncompliance under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, or Section 109 of the Housing and Community Development Act of 1974;
- iv. has received a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of provisions of a state or local law proscribing discrimination in housing based on sexual orientation or gender identity; or
- v. has received a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of a state or local law proscribing discrimination in housing based on lawful source of income; and
- vi. if applicable, has not resolved to HUD's satisfaction, the charge, lawsuit, letter of findings or cause determination referenced in subparagraphs (i), (ii), (iii), (iv) or (v) and/or is not in current compliance with any agreement or consent order resolving the matter.

**SPRAC Eligibility Criteria: Section 202 Properties**

Eligible Owner-Applicants may apply for SPRAC assistance for properties that meet the following criteria:

1. The subject property must be an existing Section 202 property with:
  - a. An original mortgage interest rate of six percent or less (funded prior to 1974); AND
  - b. Unassisted units; AND
  - c. A mortgage which is not scheduled to mature either prior to, or within sixty (60) calendar days following **July 3, 2013**. Neither properties with mortgage maturity dates that predate the SPRAC application deadline, nor properties with mortgage

maturity dates within 60 calendar days immediately following **July 3, 2013**, will be eligible for SPRAC awards, and will not be ranked for funding consideration purposes.

2. Their most recent Real Estate Assessment Center (REAC) score at the property must be 60 or above, and the property must have no open Exigent Health and Safety findings.
  - a. HUD will consider granting exceptions to the REAC threshold if the Owner-Applicant or purchaser can demonstrate that a plan has been established to obtain financing to address physical needs of property. For purposes of this exception, HUD will consider a statement that has been signed and dated by the Owner-Applicant or purchaser describing the progress-to-date that has been made to secure the financing necessary for property repairs, as well as any information describing the proposed rehabilitation work and the related schedule. This statement must be included as a part of the Owner-Applicant's initial SPRAC application package.
  - b. Documented evidence of this plan must be submitted as a part of the Owner-Applicant's or purchaser's prepayment application. Under this final Notice, HUD will accept a completed PCNA identifying the repair work necessary to meet the REAC standard under this final Notice. HUD will also accept an accompanying statement of work for the necessary repairs in addition to the PCNA.
  - c. HUD will not make any final award of SPRAC funds to any Owner-Applicant or purchaser who does not provide HUD with acceptable documentation of full compliance with this REAC standard at time of the prepayment application submission, as applicable.

3. Their most recent Management and Occupancy Review score at the property must be satisfactory or higher.
  - a. HUD will consider exceptions to the MOR threshold if the Owner-Applicant or purchaser can demonstrate that a plan has been established to replace the management agent or take other corrective actions. This documentation must be included as a part of the Owner-Applicant's initial SPRAC application package.
  - b. Documented evidence that this plan has been executed by must be submitted as a part of the Owner-Applicant's or purchaser's prepayment application. Under this final Notice, HUD will only accept a notarized copy of the minutes of the property's board of directors, or other substantially similar document, confirming that the Owner-Applicant or purchaser has in fact replaced the management agent or otherwise taken other necessary and appropriate corrective actions for purposes of this exception.
  - c. HUD will not make any final award of SPRAC funds to any Owner-Applicant or purchaser who does not provide HUD with acceptable documentation of full compliance with this MOR standard at time of the prepayment application submission, as applicable.
4. Their property must have no open referrals to the Departmental Enforcement Center.
  - a. HUD will consider exceptions to the DEC threshold if the Owner-Applicant or purchaser can demonstrate that a plan has been established to address open DEC findings. This documentation must be included as a part of the Owner-Applicant's initial SPRAC application package.
  - b. Documented evidence that this plan has been executed by must be submitted as a part of the Owner-Applicant's or purchaser's prepayment application. Under this final Notice,

- HUD will only accept a letter from the DEC to either the Owner-Applicant or the purchaser, as applicable, attesting that the open DEC findings have been cleared for purposes of this exception. All open DEC findings must be cleared prior to prepayment approval, a fact that the Office of Affordable Housing Preservation will confirm with DEC during its review of the Owner-Applicant's or purchaser's prepayment application.
- c. HUD will not make any final award of SPRAC funds to any Owner-Applicant or purchaser who does not provide HUD with acceptable documentation of full compliance with this DEC standard at time of the prepayment application submission, as applicable.
5. Owner-Applicant commits to target SPRAC assistance exclusively to existing low-income and very low-income tenants residing at the subject property at the time of the 202 Direct Loan prepayment, and exclusively to very low-income applicants upon unit turnover (Tiers One and Two), or to low-income applicants upon unit turnover (Tiers Three and Four).
  6. The Owner-Applicant must intend to refinance the existing Section 202 mortgage under the terms and conditions of AHEO, as amended. The Owner-Applicant must demonstrate that without SPRAC assistance, the rents for existing unassisted tenants will be raised to compensate for the increased debt service costs resulting from prepayment at a higher interest rate.
    - a. A purchase/acquisition transaction is also eligible. In the case of an acquisition, the current Owner must submit the SPRAC request but may provide evidence in the form of a purchase/sale agreement that the prepayment will include an acquisition and subsequent change in property management.

7. The Owner-Applicant's proposed rehabilitation work at the subject property meets the standards of either Capital Repairs or Substantial Rehabilitation, as defined under this final Notice.
8. The subject property is located within an eligible High Need county, as identified by HUD (see Attachment 2).
9. The subject property is proximate to the amenities and services needed by property tenants; **OR** documentation verifying that if the property is not currently proximate to social, recreational, educational, commercial, and health facilities or services, the preservation of this Section 202 property is an integral part of a concerted community revitalization plan that will, among other things, include the establishment of these services and amenities in locations that are proximate to the site of the subject property, **AND** the Owner-Applicant's certification of the nexus between the proposed preservation of the Section 202 property by the Owner-Applicant and the Livability Principles as they are being advanced in the Preferred Sustainability Status Community where the subject property is located; **OR** documentation verifying that supportive services for the 202 property have been arranged for through a direct service provider in the absence of direct or general proximity to such services in the neighborhood and surrounding community, consisting of a letter from the Owner-Applicant verifying what specific services and amenities are available to property tenants, and which has been approved by the applicable HUD field office.

**NOTE:** HUD maintains that an Owner-Applicant whose property is experiencing or has experienced a notably high rate of vacancy must address this issue to HUD's satisfaction for award consideration purposes under this final Notice. If either the property's current vacancy

rate, or its average vacancy rate for the 24-month period preceding the SPRAC application submission is greater than **10 percent**, the Owner-Applicant must provide HUD with a detailed explanation accounting for this, along with detailed information describing what actions the Owner-Applicant will take or is taking to mitigate this circumstance. HUD expects in many such cases, vacancies will likely be due to the un-marketability of one or more of the current units within the property. In turn, HUD expects that this will result in the need for unit conversions in accordance with Housing Notice 2011-03, or with any subsequent guidance as HUD may publish.

### **SPRAC Award Prioritization**

Funding for SPRAC awards is extremely limited and a significant number of equally worthy projects are expected to compete for SPRAC funding. To allocate these scarce resources effectively, HUD will award SPRAC funds through an application process, open to those projects electing to prepay and refinance the Section 202 Direct Loan under the terms of AHEO and HUD guidance provided in Housing Notice 2012-08, or any subsequent Departmental guidance on Section 202 Direct Loan prepayment requirements.<sup>14</sup> HUD will award SPRAC funds using an application process where eligible applications will be ranked under four separate tiers (Tiers One through Four) for funding consideration, as follows:

1. Properties that commit to serving very low-income tenants and to completing substantial rehabilitation.
2. Properties that commit to serving very low-income tenants and to completing capital repairs.

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<sup>14</sup> Multifamily OAHP and Asset Management anticipate that the new prepayment notice will be published prior to this final SPRAC notice. The official publication number of the prepayment notice will be inserted in this document at that time.

3. Properties that commit to serving low-income tenants and to completing substantial rehabilitation.
4. Properties that commit to serving low-income tenants and to completing capital repairs.

When evaluating SPRAC applications for eligibility and possible award consideration, HUD's top priority is protecting existing low-income unassisted tenants from displacement and providing assistance to very low-income tenants in the future. Therefore, HUD will give priority to those qualified Owner-Applicants that commit to target 100 percent of SPRAC assistance to very low-income and low-income tenants residing in the project at the time of the Direct Loan prepayment, and exclusively to very low-income tenants at unit turnover. These projects will be ranked under Tier One for SPRAC award consideration so long as the Owner-Applicant also proposes to complete substantial rehabilitation of the property. Households that currently reside in unassisted units at the Section 202 Direct Loan project, and that meet the low-income eligibility criteria (at or below 80 percent of AMI) will be eligible to receive SPRAC assistance. However, HUD requires that in order for any such project applications to be considered for SPRAC funding under Tier One, the Owner-Applicant must commit to make these SPRAC units available exclusively to very low-income households upon unit turnover, as well as to completing substantial rehabilitation of the property.

To determine low-income and very low-income thresholds, the Owner-Applicant must determine the annual income of applicable tenant households by following the income verification process described in HUD Handbook 4350.3, *Occupancy Requirements of Subsidized Multifamily Housing Programs*<sup>15</sup>. The Owner-Applicant must compare the tenant

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<sup>15</sup> This HUD Handbook may be accessed at the following URL:  
[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/hudclips/handbooks/hsg/4350.3](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsg/4350.3)

household's annual income with HUD's current FY income limits. For this comparison, Owner-Applicants must verify the size of the tenant household (e.g., 1-person household). Owner-Applicants may find HUD's current FY13 low-income limits, adjusted for household size, by visiting [http://www.huduser.org/portal/datasets/il/il13/index\\_il2013.html](http://www.huduser.org/portal/datasets/il/il13/index_il2013.html), and clicking on "Click Here for FY 2013 IL Documentation." The Owner-Applicant then selects the state and county in which a given property is located, and clicks "Next Screen." The relevant information is located in the row labeled "Very Low (50 percent) Income Limits." If the tenant household's annual income is greater than the very low-income limit found in this row, the household does **not** qualify as a very low-income household for the purposes of SPRAC eligibility. HUD posts updated fiscal year income limit information at the following URL:

<http://www.huduser.org/portal/datasets/il.html>.

Eligible projects under Tiers One through Four will be ranked further by mortgage maturity date. Beginning with Tier One, projects will be awarded SPRAC in chronological order by mortgage maturity date until funding is exhausted. If funding is not exhausted by awards made to eligible projects under Tier One, awards will be made in chronological order of mortgage maturity date for projects under Tier Two, and so on through Tier Four, as applicable.

Please note that in cases where a Section 202 property was constructed in multiple phases, HUD will consider these various phases to constitute one property for purposes of this final Notice **so long as** these various phases share major systems. For purposes of the SPRAC Program, the earliest of the Section 202 mortgages associated with these phases will be used to establish the property's mortgage maturity date.

If two properties in a given tier have the same mortgage maturity date, the project located in the county with the greater need for affordable elderly housing<sup>16</sup> will be given priority, because residents in these areas would have the most difficulty securing affordable housing if they did not have access to rental assistance. To determine the established rate of affordable elderly housing need, as determined by HUD, for the county where a property is located, please see Attachment 2. If the properties are located in counties that both have the same established rate of affordable elderly housing need, HUD will select the project with the greatest number of unassisted units to be funded within the limitation of available funds, in order to reach the greatest number of impacted tenants.

Properties selected via the SPRAC application process described under this final Notice will receive a preliminary Notification to Proceed Letter notification of SPRAC award (“Notification to Proceed Letter”) from HUD. Final SPRAC awards will be contingent on the property successfully receiving HUD approval to prepay the Section 202 Direct Loan under the requirements of AHEO and any standing (Housing Notice 2012-08) or subsequent HUD guidance related to Section 202 Direct Loan prepayments.

### **SPRAC Application and Award Process**

Under this final Notice, HUD is establishing a six-stage process for the award of SPRACs:

1. Submission by the Owner-Applicant of an Expression of Interest Letter (“SPRAC Application”);

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<sup>16</sup> HUD defines this need (“High Need”) as the percent of all households in a county with at least one person above the age of 62 that are also renters at or below 80% of Area Median Income (AMI) and exhibit one of the following standard housing problems, or any combination thereof: lack sufficient plumbing or kitchen facilities; and/or overcrowding, re: have more than one person per room; and/or household pays more than 30 percent of monthly income on rent.

2. Separation of qualified Owner-Applicants into Tiers One through Four based first on each Owner-Applicant's income targeting commitment and then on the Owner-Applicant's proposed level of property repairs;
3. Ranking of Eligible Applications by Mortgage Maturity Date;
4. Notification to Proceed Letter ("Notification");
5. Completion of Prepayment Request and Approval; and
6. Fund Reservation, Commitment, and Obligation.

Stage 1: Owner submits an Expression of Interest Letter

An Owner-Applicant must first determine that the 202 Direct Loan property meets the basic eligibility criteria for a SPRAC award, as outlined previously under this final Notice. An interested and eligible Owner-Applicant will then submit an Expression of Interest Letter for SPRAC award to HUD. The Expression of Interest Letter constitutes the Owner-Applicant's application ("Application") for a SPRAC award. The submission deadline for all SPRAC Applications is **60 calendar days** (two months) from the publication date of this final Notice, which is **September 3, 2013**. In order to be considered for SPRAC funding, the following information must be included with the Owner-Applicant's Application submission:

1. Project name and FHA number (as applicable), along with a summary of the amortization and repayment terms of the original 202 mortgage, including the original mortgage maturity date.
2. An electronic submission (.pdf version) of the property's most current rent rolls demonstrating the total number of units, and specifying the total number of these that are assisted with a rental subsidy, and the total number of units that are not assisted ("unassisted") with a rental subsidy.

3. An electronic submission (.pdf version) of the Owner-Applicant's or purchaser's most recent REAC scoring report issued by HUD for the subject property.
  - a. HUD will consider granting exceptions to the REAC threshold if the Owner-Applicant or purchaser can demonstrate that a plan has been established to obtain financing to address physical needs of property. For purposes of this exception, HUD will consider a statement that has been signed and dated by the Owner-Applicant or purchaser describing the progress-to-date that has been made to secure the financing necessary for property repairs, as well as any information describing the proposed rehabilitation work and the related schedule. This statement must be included as a part of the Owner-Applicant's initial SPRAC application.
  - b. Documented evidence of this plan must be submitted as a part of the Owner-Applicant's or purchaser's prepayment application. Under this final Notice, HUD will accept a completed PCNA identifying the repair work necessary to meet the REAC standard under this final Notice. HUD will also accept an accompanying statement of work for the necessary repairs in addition to the PCNA.
  - c. HUD will not make any final award of SPRAC funds to any Owner-Applicant or purchaser who does not provide HUD with acceptable documentation of full compliance with this REAC standard at time of the prepayment application submission, as applicable.
4. An electronic submission (.pdf version) of the Owner-Applicant's most recent Management and Occupancy Review (MOR) evaluation report issued by HUD for the subject property.

- a. HUD will consider granting exceptions to the MOR threshold if the Owner-Applicant or purchaser can demonstrate that a plan has been established to replace the management agent or take other necessary and appropriate corrective actions. This statement must be included as a part of the Owner-Applicant's initial SPRAC application.
  - b. Documented evidence that this plan has been executed must be submitted as a part of the Owner-Applicant's or purchaser's prepayment application. Under this final Notice, HUD will only accept a notarized copy of the minutes of the property's board of directors, or other substantially similar documentation, confirming that the Owner-Applicant or purchaser has in fact replaced the management agent or otherwise taken other necessary and appropriate corrective actions for purposes of this exception.
  - c. HUD will not make any final award of SPRAC funds to any Owner-Applicant or purchaser that does not provide HUD with acceptable documentation of full compliance with this MOR standard at the time of the prepayment application submission, as applicable.
5. A certification that has been signed and dated by the Owner-Applicant or purchaser and notarized by a notary public (subject to penalty under 18 U.S.C. § 1001) attesting that the subject property has no open referrals to HUD's Departmental Enforcement Center (DEC).
- a. HUD will consider exceptions to the DEC threshold if the Owner-Applicant or purchaser can demonstrate that a plan has been established to address open DEC findings. For purposes of this exception, HUD will consider a statement that has been signed and dated by the Owner-Applicant or purchaser describing the nature of any open

- referral or referrals that have been made against the subject property to HUD's Departmental Enforcement Center (DEC), along with a description of the steps that the Owner-Applicant or purchaser is taking or is committed to taking to ensure that any and all open DEC findings will be cleared prior to prepayment approval. This statement must be included as a part of the Owner-Applicant's initial SPRAC application.
- b. Documented evidence that this plan has been executed by must be submitted as a part of the Owner-Applicant's or purchaser's prepayment application. Under this final Notice, HUD will only accept a letter from the DEC to either the Owner-Applicant or the purchaser, as applicable, attesting that the open DEC findings have been cleared for purposes of this exception. All open DEC findings must be cleared prior to prepayment approval, a fact that the Office of Affordable Housing Preservation will confirm with DEC during its review of the Owner-Applicant's or purchaser's prepayment application.
  - c. HUD will not make any final award of SPRAC funds to any Owner-Applicant or purchaser who does not provide HUD with acceptable documentation of full compliance with this DEC standard requirement at time of the prepayment application submission, as applicable.
6. A certification that has been signed and dated by the Owner-Applicant attesting that any SPRAC funds awarded under this final Notice will be targeted by the Owner-Applicant to exclusively assist existing low-income and very low-income tenants residing at the property at the time of the 202 Direct Loan prepayment, and specifying whether SPRAC units will be reserved solely for new very low-income applicants (50 percent of Area Media Income) upon unit turnover, or for both low-income applicants (80 percent of Area Median Income) and very low-income applicants upon unit turnover, as applicable.

7. A summary narrative describing the Owner-Applicant's plans to refinance the property's current mortgage under the terms and conditions of AHEO, as amended, and in order to raise money that is needed to complete proposed property repairs that rise to the level of either capital repair or substantial rehabilitation, as these terms are defined under this final Notice. The narrative must include any information pertaining to preliminary discussions that have been held with a lender or lenders and the proposed terms that may have been described for the refinancing product, as applicable. The Owner-Applicant must demonstrate that without SPRAC assistance, the rents for existing unassisted tenants will be raised to compensate for the increased debt service costs resulting from prepayment at a higher interest rate.
  - a. A purchase/acquisition transaction is also eligible. In the case of an acquisition, the current Owner must submit the SPRAC Letter of Intention, but may provide evidence in the form of a purchase/sale agreement that the prepayment will include an acquisition and subsequent change in property management.
8. The Owner-Applicant's proposed rehabilitation work at the subject property meets the standards of either Capital Repairs or Substantial Rehabilitation, as defined under this final Notice.
9. Documentation demonstrating that the subject property is located within a High Need county, as identified under Attachment 2.
10. The Owner-Applicant must submit one of the following to demonstrate that the property is proximate to amenities and services needed by the property tenant population:
  - A. Submit a letter, signed by the Housing, Planning, or Community Development office of the local municipality verifying that:

i) This Section 202 property is proximate to social, recreational, educational, commercial, and health facilities and services, and other municipal facilities and services;

**OR**

ii) If the Section 202 property is not currently proximate to social, recreational, educational, commercial, and health facilities or services, the preservation of this Section 202 property is an integral part of a concerted community revitalization plan.

**OR**

B. Provide a certification from the Designated Point of Contact for the designated Preferred Sustainability Status Community where the property is located, using Form HUD 2995<sup>17</sup>. A list of Preferred Sustainability Status Communities and the corresponding points of contact can be found here: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/grants/nofa11/psscontacts](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/nofa11/psscontacts). The form will certify the nexus between the proposed preservation of the Section 202 property by the Owner-Applicant and the Livability Principles as they are being advanced in the Preferred Sustainability Status Community. This certification must be signed and dated anytime from the date of the publication of this SPRAC Final Notice to the SPRAC funding opportunity application deadline, which is **September 3, 2013**. Any certifications signed before or after those dates will not be acceptable.

**OR**

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<sup>17</sup>Form HUD 2995 can be accessed at the following URL:  
<http://portal.hud.gov/hudportal/documents/huddoc?id=HUD2995SCICert6-1-11.pdf>

C. Provide documentation verifying that supportive services and other amenities, as applicable, for the 202 property have been arranged for through a direct service provider in the absence of direct or general proximity to such services and amenities in the neighborhood and surrounding community. Acceptable documentation of eligibility under this criterion shall consist of a letter from the Owner-Applicant verifying what specific contractor-provided services are made available on-site to property tenants, and that has received the prior written approval of the applicable HUD field office.

11. A Rent Comparability Study (RCS) commissioned by the Owner-Applicant will be required for each transaction. The RCS will be used to establish an initial estimate of the approximate amount of SPRAC funding needed to provide assistance at applicable market rent levels for the property's unassisted units. The RCS must be completed in accordance with Chapter 9 of the *Section 8 Renewal Policy Guidebook*. If the property has a Section 8 HAP contract and the Owner-Applicant has commissioned an RCS within the last five years, this most recent RCS may be used per the guidelines of Chapter 9 of the *Section 8 Renewal Policy Guidebook*. HUD will use the Owner-Applicant's RCS to establish an initial approximation of contract rents based on comparable market rents.<sup>18</sup> **NOTE** that the Owner-Applicant may include the cost of the RCS in the submission of its project sources and uses pro forma under this final Notice.
12. A certification that has been signed and dated by the Owner-Applicant and notarized by a notary public, subject to penalty under 18 U.S.C. § 1001, attesting that the Owner-

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<sup>18</sup> At this stage, HUD will use the RCS to forecast the potential SPRAC rent levels and the associated cost of providing assistance to the unassisted units at the property. The RCS will not be interpreted as the final rent or assistance level, which will be determined at a later stage of the process. The Owner-Applicant is not required to provide an assessment or calculation of assistance at this stage.

Applicant is in compliance with the nondiscrimination threshold requirements set forth under “Owner-Applicant SPRAC Eligibility Criteria” in this Notice.

#### Curable Deficiencies Threshold

If HUD determines that a SPRAC application submission does not meet the program eligibility requirements due to missing or incomplete information and/or documentation (and **NOT** due to HUD’s determination that the proposed project and/or the Owner-Applicant is/are not eligible for SPRAC under the eligibility criteria of this final Notice), HUD may allow such Owner-Applicant the opportunity to cure any such deficiency or deficiencies within ten (10) business days from the date that HUD notifies the Owner-Applicant of said deficiency or deficiencies. For purposes of the SPRAC application criteria under this final Notice, deficiencies shall include an Owner-Applicant’s failure to provide the requisite information accounting for the subject property’s vacancy rate, either current or averaged over the 24-month period preceding the SPRAC application submission, where this rate exceeds **10 percent**, and/or detailed information describing what actions the Owner-Applicant will take or is taking to mitigate this circumstance.

HUD will notify each such Owner-Applicant **by e-mail** of the deficiency or deficiencies and permit the Owner-Applicant to submit the missing or incomplete information and/or documentation necessary to cure such deficiency or deficiencies. Owner-Applicant must submit the additional application information and/or documentation to HUD within **ten (10) business days** of the date of the HUD e-mail notification to the following HUD e-mail address: [SPRAC@hud.gov](mailto:SPRAC@hud.gov). All such Owner-Applicants who receive this notification from HUD will have only one opportunity to successfully correct any identified application deficiencies. Failure on the part of any such Owner-Applicant, for whatever reason, to successfully correct any

identified application deficiencies according to the criteria specified by HUD will result in HUD's rejection of that application.

**NOTE:** Upon completion of the application evaluation process, HUD will notify those Owner-Applicants who do not meet the qualifications for, or are not otherwise selected to receive a SPRAC award under this final Notice.

Stage 2: Separation of Applications by Very Low-Income Targeting into Tiers One Through Four

Those qualified Owner-Applicants whose Applications include a statement of commitment to use SPRAC assistance for existing low-income and very low-income tenants residing at the property at the time of the 202 Direct Loan prepayment, and exclusively for new very-low income tenants (50 percent of AMI) upon unit turnover will be ranked under Tiers One and Two, with the proposed level of project rehabilitation (substantial rehabilitation vs. capital repairs) serving as the factor HUD will use to differentiate between Applications that otherwise commit to this level of income targeting. Those qualified Owner-Applicants whose Applications include a statement of commitment to use SPRAC assistance for existing low-income and very low-income tenants residing at the property at the time of the 202 Direct Loan prepayment, and exclusively for new low-income tenants (80 percent of AMI) upon unit turnover will be ranked under either Tiers Three or Four, with the proposed level of project rehabilitation (substantial rehabilitation vs. capital repairs) serving as the factor HUD will use to differentiate between Applications that otherwise commit to this level of income targeting.

Stage 3: Ranking of Applications by Mortgage Maturity Date.

Upon the expiration of the Application submission deadline and the separation of qualified Owner-Applicants into Tiers One through Four, HUD will rank the qualified Owner-Applicants and

corresponding projects by mortgage maturity date, as previously described. Beginning with Tier One, HUD will award SPRAC funding in chronological order of each project's mortgage maturity date, using the RCS, the number of unassisted units, and contract cost information in comparable properties to estimate needed funding, until all SPRAC funds are exhausted. HUD will not make partial awards under this final Notice. HUD will only select projects that can be fully funded with available SPRAC funds. For example, if the next project on the list includes 100 unassisted units, HUD will only select this project for funding if there are sufficient SPRAC resources to fund all 100 units under the contract. If available resources are not sufficient, HUD will select the next eligible project that can be fully funded or will close the award process until further notice.

#### Stage 4: Notification to Proceed Letter

Upon selection, the Owner-Applicant will receive a Notification to Proceed Letter ("Notification") confirming the project was selected by HUD to receive a SPRAC award. This Notification will specify that SPRAC assistance will only be provided for unassisted units occupied by income-eligible residents (at or below 80 percent of AMI) at the time of execution of the SPRAC. The Notification will not guarantee funding, as the Owner-Applicant will need to first meet all criteria and successfully complete the Section 202 prepayment process according to HUD guidance provided in Housing Notice 2012-08, or any subsequent Departmental guidance on Section 202 Direct Loan prepayment requirements, before receiving SPRAC funds. The Notification will include an estimated dollar amount for potential SPRAC assistance, as determined by HUD through use of the required RCS submitted by the Owner-Applicant. As with HUD's Mark-Up-to-Market rent-setting policies, HUD will commission an independent rent comparability study at time of the Owner-Applicant's prepayment application for comparison purposes under SPRAC. This amount is subject to change based on HUD's final determination of the number of

income-eligible unassisted units at the property and market comparable rents using the Owner-Applicant's updated RCS, as well as HUD's evaluation of the Owner-Applicant's provision of a Property Capital Needs Assessment (PCNA) with the Section 202 prepayment application submission. The Owner-Applicant will be required to verify tenant incomes to determine the number of income-eligible households (at 80 percent AMI or below, as determined by HUD) residing in unassisted units at the time the SPRAC is executed.

At the time the Owner applies to HUD for SPRAC assistance, HUD shall examine the Owner-Applicant's lists of dwelling units leased and not leased, respectively. Based upon this evaluation, HUD shall determine the maximum number of leased units at the Owner-Applicant's property that are eligible for and that may receive SPRAC assistance. At the time of the SPRAC execution, HUD shall state in writing its final determination with respect to the total number of SPRAC-eligible leased units and for which of those units it will make SPRAC payments pursuant to the Contract.

The maximum possible number of leased units that are eligible for and which may receive SPRAC assistance shall be established by HUD at time of the Owner's initial application. If, at the time of execution of the SPRAC, the total number of SPRAC-eligible leased units is less than the total number initially established by HUD at time of the Owner's initial SPRAC application, HUD, at its sole discretion, may reduce the Owner's total SPRAC award. Conversely, the total number of leased units that are eligible for and which may receive SPRAC assistance shall be capped at the maximum number of eligible units as determined by HUD at time of the Owner's initial application. While the total number of income-eligible leased units may increase in number between the dates of the Owner's initial application and the execution of the SPRAC, HUD will not increase the amount of the Owner's SPRAC award at the

time of SPRAC execution on this basis, as the purpose of the SPRAC Program is to prevent the displacement of existing income-eligible tenants.

The Notification to Proceed (“Notification”) will be valid for up to 240 calendar days (8 months), subject to certain possible exceptions as described further under this section. This time period does not include HUD Application evaluation and processing time. Final approval of the SPRAC award will be conditioned in part on HUD’s prior approval of an Owner-Applicant’s prepayment request and the closing of the proposed refinance. The Owner-Applicant must submit a complete prepayment request to the Multifamily Office of Affordable Housing Preservation (OAHP) at HUD Headquarters in Washington, DC, within **60 days** of the date of the Notification. Exceptions to this deadline that HUD will consider are described further under this section. The Owner-Applicant’s prepayment request must include a Property Capital Needs Assessment (PCNA). The PCNA will be used to fully evaluate the project per the project ranking criteria described under this final Notice. In order to satisfy the PCNA requirements of the 202 prepayment application, Owner-Applicants will have the option of submitting a completed “green” PCNA (re: a HUD RAD SOW or a RAD PCA), as may be modified to specifically meet the requirements of SPRAC, or a substantially-equivalent standard, with the prior written approval of HUD, and which contains a Green Building component. HUD will use the Owner-Applicant’s PCNA to establish the repair needs of the property for purpose of ranking each application under one of the four tiers, as described under this final Notice. Please note that HUD will not assign a higher rank to any Application where the Owner-Applicant’s PCNA indicates a need for capital repairs, and the Owner-Applicant commits to completing substantial rehabilitation. Likewise, HUD will not award SPRAC funds to any Owner-Applicant whose

application proposes to complete capital repairs on the property, but whose PCNA indicates the need for substantial rehabilitation.

The Owner-Applicant's SPRAC Application will include, among other things, information describing the proposed level of repair work to be conducted to improve the property. Applications indicating an Owner-Applicant's intention to perform substantial rehabilitation work on the property will be ranked under either Tier One or Tier Three, depending upon the Owner-Applicant's income targeting commitment. In the event that an Owner-Applicant's subsequent PCNA submission indicates that the actual level of repair work is either less than or greater than what was originally proposed under the Application, that Owner-Applicant's Application will be re-ranked accordingly under either Tiers One or Three, or Tiers Two or Four, depending upon the Owner-Applicant's income targeting commitment.

**NOTE:** An Owner-Applicant's failure to submit the prepayment request within 60 days of the date of the Notification will nullify the Notification and the Owner-Applicant's eligibility to receive a SPRAC award under this round of funding.

Upon notification of HUD's approval of the prepayment application, as applicable, Owner-Applicants will have up to 180 additional calendar days to close on the proposed refinancing and to prepay their current 202 direct loan, subject to certain possible exceptions as described further under this section. Each of the following conditions will result in HUD's cancellation of the project's selection for a SPRAC award, and any corresponding program funds will be released:

- If the Owner-Applicant's prepayment application is not submitted within 60 days of the date of the Notification; or

- If the Owner-Applicant does not close the refinancing in within the time period specified under this final Notice; or
- If the Owner-Applicant's prepayment approval is not granted.

HUD will make every possible effort to complete its application selection process and issue Notification to Proceed letters as soon as possible so that all selected Owner-Applicants, and particularly those with imminent mortgage maturity dates, have as much time as possible to close on the mortgage refinance. If a selected Owner-Applicant's loan refinance does not close before the mortgage maturity date, for whatever reason, HUD shall rescind the award of SPRAC funds to any such Owner-Applicant, in which case HUD, at its sole discretion, may award any such funds to another eligible Owner-Applicant who was not selected under the initial round of SPRAC awards.

*Possible Exceptions to HUD's 60-Day Deadline:* If the Owner-Applicant is planning to use FHA financing, HUD will extend the Notification to accommodate the timeline for FHA application reviews, provided that the Owner-Applicant submits evidence of submission of an FHA insured loan application. HUD will also extend the Notification if the Owner-Applicant pursues Low Income Housing Tax Credits (LIHTCs), either in the form of 9 percent or 4 percent LIHTCs, under the most immediate LIHTC funding round in the Owner-Applicant's state in which applications will be received (either current or pending). The Owner-Applicant must submit evidence to HUD of tax credit application in order to receive a prepayment application deadline extension from HUD. Under this circumstance, the Owner-Applicant's original SPRAC application should include only one prepayment financing plan reflecting the inclusion of the tax credit equity. In the event that the Owner-Applicant applies and is approved for a 9 percent LIHTC award, the Owner-Applicant will have up to 180 calendar days from the date of

the LIHTC award notification to close on financing. In the event that the Owner-Applicant applies and is not approved for a 9 percent LIHTC award, HUD will provide each such Owner-Applicant with up to 60 additional calendar days after they are notified of not receiving a LIHTC award in order to complete and submit a revised Section 202 prepayment financing plan demonstrating how it is financially feasible for the project to meet Section 202 prepayment requirements without 9 percent tax credits. The Owner-Applicant's revised financing plan can include information about the use of 4 percent tax credit equity in each case where the applicant seeks to secure this form of project capital in place of the 9 percent credits **so long as** the applicant pursues the 4 percent credits under the first available funding round. However, please note that HUD will not accept any revised financing plan that reflects the Owner-Applicant's intention to reapply for 9 percent tax credits. Regardless of whether tax credits will or will not be used to finance the proposed project, the Owner-Applicant's financing plan must include a detailed sources and uses statement (and a newly-revised RCS is also required if the addition, or lack thereof, of tax credit financing results in any substantial change to the project scope of work). The Owner-Applicant's sources and uses statement must include information about funds that the Owner-Applicant has budgeted in anticipation of tenant relocation, as applicable. Please note that the Owner-Applicant may include the cost of the RCS in the submission of its project sources and uses pro forma under this final Notice.

Once HUD has completed its review of the Owner-Applicant's financing plan and upon approval of the plan, the Owner-Applicant will have up to 60 calendar days to close on financing. In cases where a pending 4 percent tax credit award requires additional time, the Owner-Applicant's request for an extension of this 60 day requirement will be considered by HUD.

Please note that HUD will not approve of any request for a deadline extension in any case where an Owner-Applicant's Section 202 Direct Loan has matured, or is scheduled to mature prior to the scheduled tax credits award date.

#### Stage 5: Prepayment Request and Approval

1. *Submission of Prepayment request to HUD within 60 days of receipt of the Notification to Proceed letter ("Notification").* Upon receipt of the Notification, the Owner-Applicant will submit a Section 202 Direct Loan prepayment request to the Multifamily Office of Affordable Housing Preservation (OAHP) at HUD Headquarters in Washington, DC within 60 calendar days of the date of the Notification. OAHP will screen, review and process the application to ensure it meets the requirements of Housing Notice 2012-08, or any subsequent Departmental guidance on Section 202 Direct Loan prepayments, and to ensure that the proposed Development Team meets the Owner-Applicant SPRAC Eligibility Criteria described under this final Notice. The review will ensure compliance with all applicable statutes, regulations and policies, including specific guidance as may be provided under this final Notice. The review will include an environmental review to be conducted by HUD Multifamily Development staff pursuant to the requirements at 24 CFR Part 50<sup>19</sup>. Guidance for completion of this review may be found in Chapter 9 of the *Multifamily Accelerated Processing (MAP) Guide*. OAHP will make a determination of prepayment approval and notify the Owner-Applicant.
2. *Rent Comparability Study and Contract Request.*<sup>20</sup> After receiving the Notification, and while the prepayment application is under consideration, the Owner-Applicant will be

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<sup>19</sup> 24 CFR Part 50, Protection and Enhancement of Environmental Quality:  
[http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_8698.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_8698.pdf)

<sup>20</sup> The SPRAC Notification to Proceed will provide the maximum number of units that may be assisted under the SPRAC. The lender should be advised of the possibility that the number of SPRAC-assisted units on the contract

required to submit an updated copy of the Rent Comparability Study (RCS) that was originally submitted with their Letter of Intent (“Application”). The updated RCS is required to provide the Owner-Applicant’s justification for the post-rehabilitation market rents for the units, and must otherwise meet the requirements of the *Section 8 Renewal Policy Guidebook*. As with HUD’s Mark-Up-to-Market rent-setting policies, HUD will commission an independent rent comparability study at time of the Owner-Applicant’s prepayment application for comparison purposes under SPRAC.

3. *Documentation of Tenant Income Eligibility.* The Owner-Applicant must also submit tenant income verification information that the Owner-Applicant has prepared according to the income verification process described in HUD Handbook 4350.3, *Occupancy Requirements of Subsidized Multifamily Housing Programs*. HUD OAHF will determine the rents for the project for the units occupied by income-eligible residents (those at or below 80 percent of AMI), and prepare the SPRAC for execution.

#### Stage 6: Fund Reservation, Commitment, and Obligation

In each case where the Owner-Applicant’s prepayment request is approved by HUD Headquarters OAHF, HUD will issue an official fund reservation for the final SPRAC funding amount for that project. Once the fund reservation is complete, HUD will execute the “Agreement to Enter into Senior Preservation Rental Assistance Contract” (“ASPRAC”) and commit SPRAC funds to the project.

Once the Owner-Applicant has successfully closed on the refinancing loan and is ready to proceed with prepayment of its Section 202 Direct Loan, it will then execute the required Use Agreement and other loan documents as well as the SPRAC. Owner-Applicants whose

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could decrease if residents are found to be over-income. The lender would rely on the RCS for “market” rents on which to underwrite the loan.

properties are subsidized under a current HAP contract with HUD must comply with the contract renewal requirements described under Housing Notice 2012-08 and any subsequent Departmental guidance on Section 202 Direct Loan prepayment requirements. Upon the Owner-Applicant's successful closing of the Section 202 prepayment and refinance, HUD will obligate the SPRAC funds to the project. In any instance where the Owner's property is also assisted under a HAP contract, the SPRAC and the HAP renewal will be executed simultaneously. No SPRAC funds will be provided to any Owner-Applicant until the Section 202 Direct Loan has been prepaid. Following the closing, the SPRAC will be administered under the rules and terms of the *Section 8 Renewal Policy Guidebook* by HUD. **NOTE:** HUD reserves the right to review and evaluate the Owner-Applicant's secondary financing and critical repair items at the SPRAC closing in cases where the prepaid Section 202 mortgage is not being replaced by an FHA-insured mortgage in order to ensure project feasibility.

### **Environmental Impact**

An Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) with respect to the environment has been made for the advance SPRAC Notice published on January 8, 2013, in accordance with HUD regulations at 24 CFR part 50 that implement section 102(2)(C) of the National Environmental Policy Act of 1969 (42 U.S.C. 4332(2)(C)), and shall pertain to the policy guidance published under this final Notice. The EA and FONSI are available for public inspection between 8 a.m. and 5 p.m. weekdays in the Regulations Division, Office of General Counsel, Department of Housing and Urban Development, 451 Seventh Street SW, Room 10276, Washington DC 20410-0500. Due to security measures at this HUD Headquarters Building, an advance appointment to review the EA and FONSI must be scheduled by calling the Regulations Division at 202-708-3055 (not a toll free number).

**Paperwork Reduction Act (PRA)**

The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control numbers 2502-0029, 2502-0275 and 2502-0182. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

Dated: June 28, 2013

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Carol J. Galante  
Assistant Secretary for Housing-  
Federal Housing Commissioner

**[FR-5667-N-02]**

## **Attachment 1: SPRAC Application Eligibility Criteria and Selection Process**

### **SPRAC Eligibility Criteria – Application (Stage 1)**

1. Section 202 properties with an original Section 202 Direct Loan interest rate of 6 percent or less, financed prior to 1974, with unassisted units and a mortgage which is not scheduled to mature either prior to, or within sixty (60) calendar days following **September 3, 2013**.
2. The property's most current rent rolls demonstrate the total number of units that are assisted with a rental subsidy, and the total number of units that are not assisted ("unassisted") with a rental subsidy.
3. REAC score of 60 or above, **OR** plan to obtain financing to address physical needs of property.
4. MOR satisfactory of higher, **OR** plan to replace management agent or take corrective actions.
5. No open DEC referrals, **OR** plan to address open DEC findings.
6. Owner-Applicant commits to target SPRAC assistance exclusively for existing low-income and very low-income tenants residing in unassisted units at the property at the time of the 202 Direct Loan prepayment, and exclusively to new very low- and/or low-income applicants (as applicable) upon unit turnover.
7. The Owner-Applicant must intend to refinance the property's existing Section 202 mortgage under the terms and conditions of AHEO, as amended. Owner-Applicant's plans to refinance the property's current mortgage demonstrate that without SPRAC assistance, the rents for existing unassisted tenants will be raised to compensate for the increased debt service costs resulting from prepayment at a higher interest rate.
  - a. A purchase/acquisition transaction is also eligible. In the case of an acquisition, the current Owner must submit the SPRAC Letter of Intention, but may provide evidence in the form of a purchase/sale agreement that the prepayment will include an acquisition and subsequent change in property management.
8. The Owner-Applicant's proposed rehabilitation work at the subject property meets the standards of either Capital Repairs or Substantial Rehabilitation, as defined under this

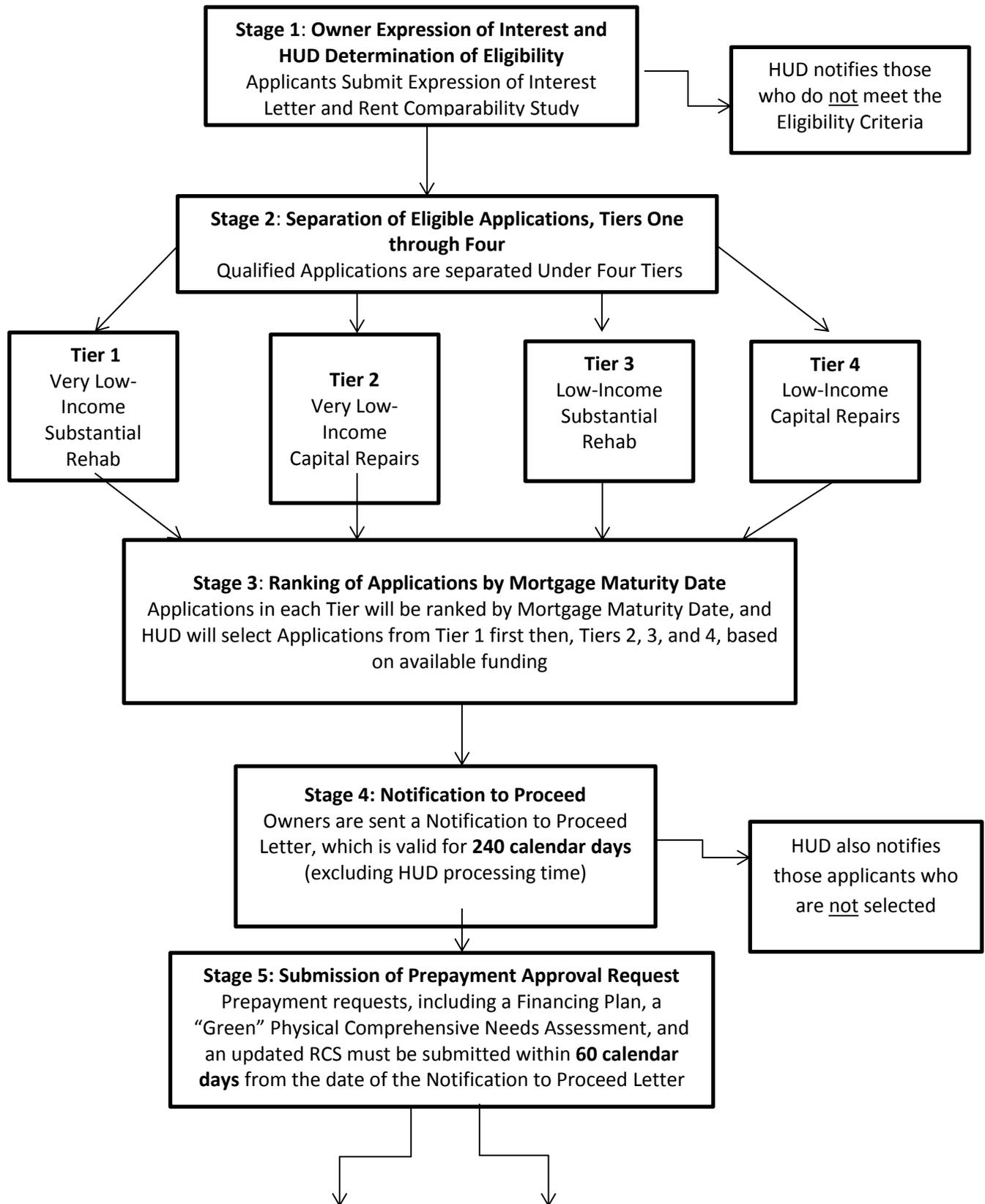
final Notice, and supported by the Owner-Applicant's PCNA report submitted with the Section 202 prepayment request.

9. The subject property is located within a High Need county, as determined by HUD, and as identified under Attachment 2 of this final Notice.
  - a. The Owner-Applicant has also provided HUD with a detailed explanation accounting for the subject property's high rate of vacancy (greater than **10 percent**), along with detailed information describing what actions the Owner-Applicant will take or is taking to mitigate this circumstance, as applicable.
10. Letter from the local municipality that the property is near needed amenities or part of a neighborhood-wide preservation/restoration strategy; **OR** verification that the preservation of the property is integral to meeting the Livability Standards in a Preferred Sustainability Status Community; **OR** verification that supportive services and other amenities for the 202 property have been arranged for through a direct service provider that has been validated by the HUD field office.
11. Owner-Applicant provides a Rent Comparability Study (RCS). The RCS must be completed in accordance with Chapter 9 of the Section 8 Renewal Policy Guidebook. If the property has a Section 8 HAP contract and the Owner-Applicant has commissioned an RCS within the last five years, this most recent RCS may be used per the guidelines of Chapter 9 of the Section 8 Renewal Policy Guidebook.
12. The Owner-Applicant meets the nondiscrimination threshold requirements set forth under "Owner-Applicant SPRAC Eligibility Criteria" of this final Notice.

#### **SPRAC Eligibility – Documentation Requirements Prepayment Application (Stage 5) –**

1. Owner-Applicant's Section 202 Direct Loan Prepayment Application package successfully addresses the "Owner-Applicant SPRAC Eligibility Criteria" of this final Notice.
2. Owner-Applicant prepares and submits an updated Rent Comparability Study.
3. Owner-Applicant submits a Property Capital Needs Assessment documenting the repair needs of the property according to the standards specified under the final Notice.
4. Owner-Applicant submits documentation of tenant income verification.

**Attachment 1: SPRAC Application Selection Process**



**Stage 6a: Funds Reservation (Non-Tax Credit Transactions)**  
IF OAHQ Headquarters approves prepayment request, Applicant has up to **180 calendar days** to close on the proposed refinancing and to prepay the Section 202 mortgage

**Stage 6b: Funds Commitment**  
Preparation and execution of ASPRAC

**Stage 6c: Funds Obligation**  
Preparation and execution of Use Agreement and SPRAC Contract, and final obligation of SPRAC funds

**Stage 6: Funds Reservation (Tax Credit Transactions)**  
Owner-Applicants seeking 9% credits have one opportunity to apply in the next scheduled tax credit application round

If Owner-Applicant receives 9% credits, they have up to **180 calendar days** to close on the proposed refinancing and to prepay the Section 202 mortgage

If Owner-Applicant applies for but does NOT receive 9% credits, HUD will provide a **60 calendar day** extension to submit a revised financing plan, which may include using 4% credits but not re-application for 9% credits

If revised financing plan includes using 4% tax credits, HUD will consider requests for extensions if a pending 4% award requires more time

If the revised financing plan does NOT include using tax credit equity, Owner-Applicants will have **60 calendar days** to close on financing upon approval of the financing plan

**Stage 6b: Funds Commitment**  
Preparation and execution of ASPRAC

**Stage 6c: Funds Obligation**  
Preparation and execution of Use Agreement and SPRAC Contract, and final obligation of SPRAC funds

## Attachment 2: SPRAC Market Eligibility

Project eligibility for a SPRAC award is premised, in part, on whether it is located in a county that has a higher rate of need for affordable housing for the elderly than exhibited by the 20<sup>th</sup> percentile of all elderly households. HUD defines this need as the percent of all households in a county with at least one person above the age of 62, that are renters at or below 80 percent of Area Median Income (AMI), and that reside in housing that exhibits one or more of the following standard housing problems:

- Lack of sufficient plumbing and/or kitchen facilities.
- Overcrowding, re: more than one person per room.
- Rent Burden, re: household pays more than 30 percent of its monthly income on rent.

Using the ACS 2006-2010 special CHAS tabulations hosted at [huduser.org](http://huduser.org), HUD calculated the 20<sup>th</sup> percentile of all elderly households at 6 percent. Thus, projects must be located in a county where more than 6 percent of its elderly households are 80 percent AMI renters with at least one housing problem.

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
01005	AL	Barbour County, Alabama	27,699	10.2
01011	AL	Bullock County, Alabama	10,923	7.4
01013	AL	Butler County, Alabama	20,895	7.8
01017	AL	Chambers County, Alabama	34,579	7
01021	AL	Chilton County, Alabama	43,121	6.3
01033	AL	Colbert County, Alabama	54,446	6.7
01041	AL	Crenshaw County, Alabama	13,928	7.5
01047	AL	Dallas County, Alabama	44,066	9.1
01059	AL	Franklin County, Alabama	31,383	7.4
01071	AL	Jackson County, Alabama	53,386	6.7
01073	AL	Jefferson County, Alabama	656,912	8.2
01077	AL	Lauderdale County, Alabama	91,762	6.8
01081	AL	Lee County, Alabama	135,010	6.4
01087	AL	Macon County, Alabama	21,699	6.5
01089	AL	Madison County, Alabama	323,080	6.2
01097	AL	Mobile County, Alabama	408,620	6.9
01101	AL	Montgomery County, Alabama	228,018	8.3
01105	AL	Perry County, Alabama	10,684	6.6
01109	AL	Pike County, Alabama	32,147	9.8
01121	AL	Talladega County, Alabama	82,347	6.6
01125	AL	Tuscaloosa County, Alabama	188,331	7.2
02016	AK	Aleutians West Census Area, Alaska	6,259	9.1

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
02020	AK	Anchorage Municipality, Alaska	284,267	12.1
02050	AK	Bethel Census Area, Alaska	16,838	6.5
02060	AK	Bristol Bay Borough, Alaska	1,049	10
02090	AK	Fairbanks North Star Borough, Alaska	94,439	7.8
02100	AK	Haines Borough, Alaska	1,658	6.7
02105	AK	Hoonah-Angoon Census Area, Alaska	2,029	11.5
02110	AK	Juneau City and Borough, Alaska	30,975	12.4
02130	AK	Ketchikan Gateway Borough, Alaska	13,396	14.2
02170	AK	Matanuska-Susitna Borough, Alaska	84,147	7.3
02185	AK	North Slope Borough, Alaska	8,852	6.2
02188	AK	Northwest Arctic Borough, Alaska	7,477	6.2
02195	AK	Petersburg Census Area, Alaska	3,841	8.9
02261	AK	Valdez-Cordova Census Area, Alaska	9,606	10.4
02290	AK	Yukon-Koyukuk Census Area, Alaska	5,635	9.3
04003	AZ	Cochise County, Arizona	129,268	6.3
04005	AZ	Coconino County, Arizona	131,824	6.4
04013	AZ	Maricopa County, Arizona	3,751,410	8.3
04019	AZ	Pima County, Arizona	964,462	8.2
04023	AZ	Santa Cruz County, Arizona	46,051	8.9
05001	AR	Arkansas County, Arkansas	19,321	7.8
05007	AR	Benton County, Arkansas	209,911	6.5
05011	AR	Bradley County, Arkansas	11,638	9.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
05017	AR	Chicot County, Arkansas	12,102	7.4
05019	AR	Clark County, Arkansas	23,083	7.9
05021	AR	Clay County, Arkansas	16,297	6.7
05031	AR	Craighead County, Arkansas	93,329	8.7
05035	AR	Crittenden County, Arkansas	50,673	11.1
05037	AR	Cross County, Arkansas	18,144	9.8
05039	AR	Dallas County, Arkansas	8,280	8.2
05041	AR	Desha County, Arkansas	13,351	9.4
05043	AR	Drew County, Arkansas	18,546	6.2
05045	AR	Faulkner County, Arkansas	108,375	6.3
05051	AR	Garland County, Arkansas	95,290	6.4
05061	AR	Howard County, Arkansas	13,778	6.6
05063	AR	Independence County, Arkansas	35,994	6.5
05067	AR	Jackson County, Arkansas	18,015	7.8
05069	AR	Jefferson County, Arkansas	78,447	7.7
05075	AR	Lawrence County, Arkansas	17,340	8.2
05077	AR	Lee County, Arkansas	10,709	9.2
05085	AR	Lonoke County, Arkansas	65,846	7.7
05093	AR	Mississippi County, Arkansas	46,815	9.8
05095	AR	Monroe County, Arkansas	8,492	10.1
05107	AR	Phillips County, Arkansas	22,412	10.2
05111	AR	Poinsett County, Arkansas	24,703	8.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
05117	AR	Prairie County, Arkansas	8,839	8.4
05119	AR	Pulaski County, Arkansas	377,060	8.1
05123	AR	St. Francis County, Arkansas	28,302	10
05131	AR	Sebastian County, Arkansas	123,847	9.4
05133	AR	Sevier County, Arkansas	16,636	8.5
05143	AR	Washington County, Arkansas	197,192	6.5
05145	AR	White County, Arkansas	74,957	8
05147	AR	Woodruff County, Arkansas	7,505	6.6
06001	CA	Alameda County, California	1,477,980	14.4
06007	CA	Butte County, California	218,635	7.9
06013	CA	Contra Costa County, California	1,024,809	9.4
06015	CA	Del Norte County, California	28,471	9.5
06019	CA	Fresno County, California	908,830	13.7
06021	CA	Glenn County, California	27,935	6.1
06023	CA	Humboldt County, California	133,058	9.8
06025	CA	Imperial County, California	168,052	19.2
06027	CA	Inyo County, California	18,434	9.6
06029	CA	Kern County, California	815,693	11.2
06031	CA	Kings County, California	151,122	10
06033	CA	Lake County, California	64,371	9
06035	CA	Lassen County, California	35,081	7.3
06037	CA	Los Angeles County, California	9,758,256	19.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
06039	CA	Madera County, California	147,738	7.9
06041	CA	Marin County, California	248,601	12.7
06045	CA	Mendocino County, California	87,487	8.5
06047	CA	Merced County, California	250,699	13.5
06053	CA	Monterey County, California	407,435	10.2
06055	CA	Napa County, California	134,051	10.9
06059	CA	Orange County, California	2,965,525	13
06061	CA	Placer County, California	336,477	9.2
06065	CA	Riverside County, California	2,109,464	9.4
06067	CA	Sacramento County, California	1,395,144	12.9
06069	CA	San Benito County, California	54,492	14.7
06071	CA	San Bernardino County, California	2,005,287	11
06073	CA	San Diego County, California	3,022,468	13.5
06075	CA	San Francisco County, California	789,172	25.3
06077	CA	San Joaquin County, California	673,613	12.1
01001	CA	San Luis Obispo County, California	265,577	8.7
06081	CA	San Mateo County, California	704,327	12.5
06083	CA	Santa Barbara County, California	416,051	11.1
06085	CA	Santa Clara County, California	1,739,396	12.1
06087	CA	Santa Cruz County, California	256,901	12.2
06089	CA	Shasta County, California	176,906	8.7
06091	CA	Sierra County, California	3,366	7.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
06093	CA	Siskiyou County, California	44,690	9.3
06095	CA	Solano County, California	410,042	10.7
06097	CA	Sonoma County, California	474,047	11.1
06099	CA	Stanislaus County, California	509,682	13.3
06101	CA	Sutter County, California	93,420	9.6
06103	CA	Tehama County, California	62,575	8.9
06107	CA	Tulare County, California	429,404	11.4
06109	CA	Tuolumne County, California	56,074	6.6
06111	CA	Ventura County, California	809,080	10.4
06113	CA	Yolo County, California	196,418	11.7
06115	CA	Yuba County, California	71,160	9.1
08001	CO	Adams County, Colorado	425,330	9.4
08003	CO	Alamosa County, Colorado	15,293	7
08005	CO	Arapahoe County, Colorado	552,860	9.1
08011	CO	Bent County, Colorado	6,125	8.3
08013	CO	Boulder County, Colorado	290,177	9.9
08014	CO	Broomfield County, Colorado	52,872	8
08031	CO	Denver County, Colorado	578,087	14.9
08041	CO	El Paso County, Colorado	599,988	9.1
08043	CO	Fremont County, Colorado	46,941	6.9
08045	CO	Garfield County, Colorado	54,761	6.7
08055	CO	Huerfano County, Colorado	6,948	7.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
08059	CO	Jefferson County, Colorado	528,614	8.9
08069	CO	Larimer County, Colorado	291,162	8.9
08071	CO	Las Animas County, Colorado	15,675	7.5
08073	CO	Lincoln County, Colorado	5,476	6.8
08077	CO	Mesa County, Colorado	142,284	7.5
08089	CO	Otero County, Colorado	18,830	11.8
08099	CO	Prowers County, Colorado	12,734	8.5
08101	CO	Pueblo County, Colorado	156,244	7.4
08109	CO	Saguache County, Colorado	6,161	6.7
08111	CO	San Juan County, Colorado	752	32.3
08123	CO	Weld County, Colorado	242,860	7.9
09001	CT	Fairfield County, Connecticut	905,342	9.7
09003	CT	Hartford County, Connecticut	887,976	11.9
09005	CT	Litchfield County, Connecticut	189,916	7.5
09007	CT	Middlesex County, Connecticut	164,774	7.6
09009	CT	New Haven County, Connecticut	856,688	13.3
09011	CT	New London County, Connecticut	272,360	8.5
09013	CT	Tolland County, Connecticut	151,073	6.5
09015	CT	Windham County, Connecticut	117,708	7.7
10001	DE	Kent County, Delaware	156,918	6.8
10003	DE	New Castle County, Delaware	533,514	8.1
11001	DC	District of Columbia, District of Columbia	584,400	18.1

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
12001	FL	Alachua County, Florida	244,247	8.2
12005	FL	Bay County, Florida	166,798	6.3
12009	FL	Brevard County, Florida	540,583	6.3
12011	FL	Broward County, Florida	1,734,139	9.2
12013	FL	Calhoun County, Florida	14,372	6.1
12031	FL	Duval County, Florida	854,848	8.6
12033	FL	Escambia County, Florida	297,940	8.4
12057	FL	Hillsborough County, Florida	1,200,236	9.2
12061	FL	Indian River County, Florida	135,518	6.3
12073	FL	Leon County, Florida	270,409	6.7
12086	FL	Miami-Dade County, Florida	2,445,374	18.6
12087	FL	Monroe County, Florida	73,065	10.3
12095	FL	Orange County, Florida	1,116,094	10.9
12097	FL	Osceola County, Florida	258,531	11.4
12099	FL	Palm Beach County, Florida	1,299,356	6.7
12103	FL	Pinellas County, Florida	918,263	8.4
12117	FL	Seminole County, Florida	417,330	7.5
12127	FL	Volusia County, Florida	496,053	6.1
13003	GA	Atkinson County, Georgia	8,332	7.4
13005	GA	Bacon County, Georgia	10,969	11.2
13011	GA	Banks County, Georgia	17,840	9.1
13013	GA	Barrow County, Georgia	66,359	8.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
13015	GA	Bartow County, Georgia	97,423	9.2
13017	GA	Ben Hill County, Georgia	17,631	7.3
13021	GA	Bibb County, Georgia	154,810	12.8
13027	GA	Brooks County, Georgia	16,338	7.4
13029	GA	Bryan County, Georgia	29,039	8.5
13031	GA	Bulloch County, Georgia	67,298	8.1
13033	GA	Burke County, Georgia	23,083	6.1
13035	GA	Butts County, Georgia	23,401	6.2
13037	GA	Calhoun County, Georgia	6,488	10
13045	GA	Carroll County, Georgia	109,227	9.3
13047	GA	Catoosa County, Georgia	62,951	6.3
13051	GA	Chatham County, Georgia	256,428	10.7
13059	GA	Clarke County, Georgia	115,070	10.7
13063	GA	Clayton County, Georgia	260,156	11.7
13067	GA	Cobb County, Georgia	677,402	7.5
13069	GA	Coffee County, Georgia	41,647	7.8
13071	GA	Colquitt County, Georgia	44,712	12.8
13077	GA	Coweta County, Georgia	121,528	8.6
13081	GA	Crisp County, Georgia	23,182	10.1
13085	GA	Dawson County, Georgia	21,758	6.6
13087	GA	Decatur County, Georgia	27,920	12.9
13089	GA	DeKalb County, Georgia	685,371	11

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
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13093	GA	Dooly County, Georgia	14,283	6.5
13095	GA	Dougherty County, Georgia	94,514	15.4
13097	GA	Douglas County, Georgia	127,800	8.1
13099	GA	Early County, Georgia	11,286	7.7
13103	GA	Effingham County, Georgia	50,513	9.2
13115	GA	Floyd County, Georgia	95,810	10.5
13119	GA	Franklin County, Georgia	22,121	6.5
13121	GA	Fulton County, Georgia	886,982	13.3
13125	GA	Glascock County, Georgia	3,007	10.6
13127	GA	Glynn County, Georgia	77,632	8.1
13129	GA	Gordon County, Georgia	54,059	8.9
13131	GA	Grady County, Georgia	24,738	7.7
13135	GA	Gwinnett County, Georgia	778,022	7
13137	GA	Habersham County, Georgia	42,212	6.7
13139	GA	Hall County, Georgia	175,001	7
13149	GA	Heard County, Georgia	11,720	7.7
13153	GA	Houston County, Georgia	134,880	7.6
13155	GA	Irwin County, Georgia	9,642	6.3
13157	GA	Jackson County, Georgia	58,347	9.3
13163	GA	Jefferson County, Georgia	16,919	6.4
13165	GA	Jenkins County, Georgia	8,400	6.8
13167	GA	Johnson County, Georgia	9,967	9.1

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
13171	GA	Lamar County, Georgia	17,837	7.8
13175	GA	Laurens County, Georgia	48,034	7.6
13177	GA	Lee County, Georgia	27,998	9.3
13185	GA	Lowndes County, Georgia	104,916	7.1
13189	GA	McDuffie County, Georgia	21,719	14.1
13193	GA	Macon County, Georgia	14,553	6.9
13205	GA	Mitchell County, Georgia	23,697	8
13213	GA	Murray County, Georgia	39,925	6.8
13215	GA	Muscogee County, Georgia	187,629	11
13217	GA	Newton County, Georgia	96,833	7.1
13223	GA	Paulding County, Georgia	134,875	7.4
13225	GA	Peach County, Georgia	26,883	12.1
13229	GA	Pierce County, Georgia	18,205	6.3
13233	GA	Polk County, Georgia	41,095	6.8
13243	GA	Randolph County, Georgia	7,724	8.4
13245	GA	Richmond County, Georgia	198,170	9.3
13247	GA	Rockdale County, Georgia	83,135	9.8
13249	GA	Schley County, Georgia	4,755	7.4
13251	GA	Screven County, Georgia	14,799	7.5
13255	GA	Spalding County, Georgia	63,304	11.7
13257	GA	Stephens County, Georgia	25,876	9.3
13259	GA	Stewart County, Georgia	5,831	7.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
13261	GA	Sumter County, Georgia	32,865	7.5
13265	GA	Taliaferro County, Georgia	2,041	8.3
13269	GA	Taylor County, Georgia	8,875	6.8
13275	GA	Thomas County, Georgia	44,451	9.5
13277	GA	Tift County, Georgia	39,823	9.3
13279	GA	Toombs County, Georgia	27,151	8.9
13285	GA	Troup County, Georgia	65,652	9.7
13287	GA	Turner County, Georgia	9,025	8.9
13293	GA	Upson County, Georgia	27,308	8
13297	GA	Walton County, Georgia	81,491	11.5
13299	GA	Ware County, Georgia	36,006	8.2
13301	GA	Warren County, Georgia	5,936	7.8
13303	GA	Washington County, Georgia	21,112	8.9
13305	GA	Wayne County, Georgia	29,705	6.4
13307	GA	Webster County, Georgia	2,727	8.2
13309	GA	Wheeler County, Georgia	7,093	6.3
13313	GA	Whitfield County, Georgia	99,910	6.2
13321	GA	Worth County, Georgia	21,712	10
15001	HI	Hawaii County, Hawaii	180,362	8.1
15003	HI	Honolulu County, Hawaii	936,984	11.3
15007	HI	Kauai County, Hawaii	65,460	8
15009	HI	Maui County, Hawaii	150,711	10.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
16001	ID	Ada County, Idaho	380,718	8.2
16013	ID	Blaine County, Idaho	21,329	8.5
16027	ID	Canyon County, Idaho	182,723	6.2
16049	ID	Idaho County, Idaho	15,947	7.6
16055	ID	Kootenai County, Idaho	134,851	8.3
16061	ID	Lewis County, Idaho	3,761	8.7
16069	ID	Nez Perce County, Idaho	38,886	9.7
16079	ID	Shoshone County, Idaho	12,917	8.3
16081	ID	Teton County, Idaho	9,413	6.6
16083	ID	Twin Falls County, Idaho	74,929	6.5
17001	IL	Adams County, Illinois	67,030	7.9
17003	IL	Alexander County, Illinois	8,449	7.4
17011	IL	Bureau County, Illinois	35,083	6.9
17013	IL	Calhoun County, Illinois	5,118	6.5
17019	IL	Champaign County, Illinois	197,867	9.2
17023	IL	Clark County, Illinois	16,545	7.4
17025	IL	Clay County, Illinois	13,927	7.3
17027	IL	Clinton County, Illinois	37,395	6.4
17031	IL	Cook County, Illinois	5,172,848	13.8
17033	IL	Crawford County, Illinois	19,864	6.3
17037	IL	DeKalb County, Illinois	104,026	8.4
17039	IL	De Witt County, Illinois	16,672	6.5

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
17041	IL	Douglas County, Illinois	20,012	7.2
17043	IL	DuPage County, Illinois	911,481	7.1
17045	IL	Edgar County, Illinois	18,776	6.6
17063	IL	Grundy County, Illinois	48,744	6.8
17075	IL	Iroquois County, Illinois	30,068	7.7
17081	IL	Jefferson County, Illinois	39,202	7.6
17083	IL	Jersey County, Illinois	22,932	6.2
17089	IL	Kane County, Illinois	502,628	9
17091	IL	Kankakee County, Illinois	112,100	10.4
17095	IL	Knox County, Illinois	52,932	9.6
17097	IL	Lake County, Illinois	697,179	7.1
17099	IL	LaSalle County, Illinois	113,789	6.7
17107	IL	Logan County, Illinois	30,440	8.3
17109	IL	McDonough County, Illinois	32,730	8.7
17113	IL	McLean County, Illinois	166,706	8.5
17115	IL	Macon County, Illinois	110,719	9.3
17119	IL	Madison County, Illinois	268,005	8
17121	IL	Marion County, Illinois	39,722	7.6
17133	IL	Monroe County, Illinois	32,431	6.3
17137	IL	Morgan County, Illinois	35,755	7.9
17141	IL	Ogle County, Illinois	53,578	6.1
17143	IL	Peoria County, Illinois	185,108	7.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
17145	IL	Perry County, Illinois	22,488	7.6
17151	IL	Pope County, Illinois	4,426	6.5
17153	IL	Pulaski County, Illinois	6,262	9.9
17161	IL	Rock Island County, Illinois	147,524	7.1
17163	IL	St. Clair County, Illinois	266,727	9.7
17165	IL	Saline County, Illinois	25,171	7.1
17167	IL	Sangamon County, Illinois	195,288	9.5
17177	IL	Stephenson County, Illinois	47,791	7.8
17179	IL	Tazewell County, Illinois	133,863	6.1
17183	IL	Vermilion County, Illinois	82,033	8.7
17185	IL	Wabash County, Illinois	12,141	8
17187	IL	Warren County, Illinois	17,745	6.2
17199	IL	Williamson County, Illinois	65,579	6.9
17201	IL	Winnebago County, Illinois	293,972	9.8
18001	IN	Adams County, Indiana	34,162	6.8
18003	IN	Allen County, Indiana	351,332	9.1
18005	IN	Bartholomew County, Indiana	75,855	8.6
18011	IN	Boone County, Indiana	54,796	6.3
18019	IN	Clark County, Indiana	107,381	7.2
18023	IN	Clinton County, Indiana	33,270	8.7
18027	IN	Daviess County, Indiana	31,045	6.3
18029	IN	Dearborn County, Indiana	49,580	9.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
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18035	IN	Delaware County, Indiana	117,344	6.4
18039	IN	Elkhart County, Indiana	196,855	7.5
18043	IN	Floyd County, Indiana	73,594	6.2
18045	IN	Fountain County, Indiana	17,329	7.5
18047	IN	Franklin County, Indiana	23,194	7.1
18053	IN	Grant County, Indiana	70,176	6.6
18059	IN	Hancock County, Indiana	68,011	6.8
18065	IN	Henry County, Indiana	48,921	9.2
18067	IN	Howard County, Indiana	83,326	7.3
18069	IN	Huntington County, Indiana	37,321	7.9
18071	IN	Jackson County, Indiana	41,902	6.5
18077	IN	Jefferson County, Indiana	32,393	7.3
18079	IN	Jennings County, Indiana	28,470	7
18081	IN	Johnson County, Indiana	135,994	8.4
18083	IN	Knox County, Indiana	38,425	6.9
18089	IN	Lake County, Indiana	494,417	8.3
18091	IN	LaPorte County, Indiana	110,937	7
18093	IN	Lawrence County, Indiana	46,192	6.4
18095	IN	Madison County, Indiana	131,444	7.6
18097	IN	Marion County, Indiana	890,976	12.4
18103	IN	Miami County, Indiana	37,307	6.8
18105	IN	Monroe County, Indiana	134,442	6.9

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
18117	IN	Orange County, Indiana	19,820	6.2
18127	IN	Porter County, Indiana	162,026	6.8
18139	IN	Rush County, Indiana	17,568	6.6
18141	IN	St. Joseph County, Indiana	266,522	8.1
18143	IN	Scott County, Indiana	24,109	7.1
18153	IN	Sullivan County, Indiana	21,520	8.5
18157	IN	Tippecanoe County, Indiana	168,635	9.2
18163	IN	Vanderburgh County, Indiana	178,298	12.9
18167	IN	Vigo County, Indiana	107,151	8.6
18171	IN	Warren County, Indiana	8,563	9.3
18173	IN	Warrick County, Indiana	58,393	6.5
18177	IN	Wayne County, Indiana	69,187	8.4
18179	IN	Wells County, Indiana	27,744	7.5
18183	IN	Whitley County, Indiana	32,991	6.6
19001	IA	Adair County, Iowa	7,779	8.3
19013	IA	Black Hawk County, Iowa	129,252	8
19015	IA	Boone County, Iowa	26,424	8
19021	IA	Buena Vista County, Iowa	19,980	7.3
19027	IA	Carroll County, Iowa	20,805	8.2
19033	IA	Cerro Gordo County, Iowa	44,324	7.8
19035	IA	Cherokee County, Iowa	12,086	6.9
19041	IA	Clay County, Iowa	16,718	10.3

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
19043	IA	Clayton County, Iowa	18,202	6.2
19045	IA	Clinton County, Iowa	49,274	10.5
19047	IA	Crawford County, Iowa	16,951	7.6
19049	IA	Dallas County, Iowa	61,714	6.9
19053	IA	Decatur County, Iowa	8,508	8.3
19061	IA	Dubuque County, Iowa	92,547	9.5
19063	IA	Emmet County, Iowa	10,389	7.3
19073	IA	Greene County, Iowa	9,448	7.4
19077	IA	Guthrie County, Iowa	11,040	8
19079	IA	Hamilton County, Iowa	15,874	7.7
19081	IA	Hancock County, Iowa	11,505	6.4
19085	IA	Harrison County, Iowa	15,073	11.1
19087	IA	Henry County, Iowa	20,263	7.6
19091	IA	Humboldt County, Iowa	9,905	8.1
19099	IA	Jasper County, Iowa	37,050	8.4
19101	IA	Jefferson County, Iowa	16,643	6.9
19103	IA	Johnson County, Iowa	126,994	8.5
19107	IA	Keokuk County, Iowa	10,614	6.1
19109	IA	Kossuth County, Iowa	15,748	6.2
19111	IA	Lee County, Iowa	35,991	9.3
19117	IA	Lucas County, Iowa	9,116	6.9
19123	IA	Mahaska County, Iowa	22,382	7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
19125	IA	Marion County, Iowa	33,378	10.4
19127	IA	Marshall County, Iowa	40,131	6.3
19131	IA	Mitchell County, Iowa	10,801	6.9
19137	IA	Montgomery County, Iowa	10,901	8.4
19139	IA	Muscatine County, Iowa	42,501	6.4
19141	IA	O'Brien County, Iowa	14,419	10.8
19143	IA	Osceola County, Iowa	6,576	8
19153	IA	Polk County, Iowa	419,301	8.6
19155	IA	Pottawattamie County, Iowa	91,928	9.3
19157	IA	Poweshiek County, Iowa	19,012	6.3
19159	IA	Ringgold County, Iowa	5,169	6.3
19163	IA	Scott County, Iowa	162,184	8.5
19175	IA	Union County, Iowa	12,409	9.6
19179	IA	Wapello County, Iowa	35,553	7.4
19181	IA	Warren County, Iowa	45,346	7.6
19183	IA	Washington County, Iowa	21,626	9.9
19189	IA	Winnebago County, Iowa	10,962	9.6
19191	IA	Winneshiek County, Iowa	21,031	8.3
19193	IA	Woodbury County, Iowa	101,217	9.9
19197	IA	Wright County, Iowa	13,384	8.8
20005	KS	Atchison County, Kansas	16,889	7.3
20013	KS	Brown County, Kansas	10,019	6.2

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
20017	KS	Chase County, Kansas	2,834	6.5
20023	KS	Cheyenne County, Kansas	2,783	8.9
20035	KS	Cowley County, Kansas	36,140	7.4
20041	KS	Dickinson County, Kansas	19,643	8.4
20045	KS	Douglas County, Kansas	109,052	10.5
20051	KS	Ellis County, Kansas	28,039	9.8
20055	KS	Finney County, Kansas	36,139	11.8
20057	KS	Ford County, Kansas	32,727	6.7
20059	KS	Franklin County, Kansas	25,841	9.1
20061	KS	Geary County, Kansas	30,537	6.3
20065	KS	Graham County, Kansas	2,663	10
20079	KS	Harvey County, Kansas	34,150	7
20083	KS	Hodgeman County, Kansas	1,955	9.8
20091	KS	Johnson County, Kansas	531,228	9.5
20103	KS	Leavenworth County, Kansas	74,611	8.9
20111	KS	Lyon County, Kansas	34,974	12.3
20121	KS	Miami County, Kansas	32,116	8.7
20123	KS	Mitchell County, Kansas	6,383	9.9
20125	KS	Montgomery County, Kansas	35,453	6.3
20127	KS	Morris County, Kansas	5,946	9.5
20137	KS	Norton County, Kansas	5,692	12.2
20149	KS	Pottawatomie County, Kansas	20,781	6.9

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
20151	KS	Pratt County, Kansas	9,670	9.3
20155	KS	Reno County, Kansas	64,054	6.9
20159	KS	Rice County, Kansas	10,128	7.6
20161	KS	Riley County, Kansas	69,035	8.2
20169	KS	Saline County, Kansas	54,982	9.1
20173	KS	Sedgwick County, Kansas	486,123	10.2
20175	KS	Seward County, Kansas	22,588	7.9
20177	KS	Shawnee County, Kansas	175,537	8
20189	KS	Stevens County, Kansas	5,533	10.1
20191	KS	Sumner County, Kansas	24,257	8.1
20193	KS	Thomas County, Kansas	7,757	8.7
20195	KS	Trego County, Kansas	2,979	9
20209	KS	Wyandotte County, Kansas	155,462	12.4
21005	KY	Anderson County, Kentucky	21,080	6.4
21007	KY	Ballard County, Kentucky	8,225	6.3
21009	KY	Barren County, Kentucky	41,685	10
21013	KY	Bell County, Kentucky	28,793	9.9
21015	KY	Boone County, Kentucky	114,723	10
21017	KY	Bourbon County, Kentucky	19,947	13.7
21019	KY	Boyd County, Kentucky	49,330	7.9
21033	KY	Caldwell County, Kentucky	12,934	6.1
21037	KY	Campbell County, Kentucky	89,016	8.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
21041	KY	Carroll County, Kentucky	10,703	12.1
21043	KY	Carter County, Kentucky	27,821	6.4
21047	KY	Christian County, Kentucky	72,678	6.7
21049	KY	Clark County, Kentucky	35,305	8.9
21051	KY	Clay County, Kentucky	22,197	7.7
21059	KY	Daviess County, Kentucky	95,398	6.7
21067	KY	Fayette County, Kentucky	288,045	10.3
21073	KY	Franklin County, Kentucky	49,067	11.2
21077	KY	Gallatin County, Kentucky	8,428	17.1
21079	KY	Garrard County, Kentucky	16,842	9.9
21087	KY	Green County, Kentucky	11,377	9.5
21095	KY	Harlan County, Kentucky	29,688	6.5
21097	KY	Harrison County, Kentucky	18,761	9.2
21101	KY	Henderson County, Kentucky	45,943	9.9
21103	KY	Henry County, Kentucky	15,474	6.3
21111	KY	Jefferson County, Kentucky	729,452	9.2
21113	KY	Jessamine County, Kentucky	47,073	9.5
21115	KY	Johnson County, Kentucky	23,325	6.3
21117	KY	Kenton County, Kentucky	158,034	10.6
21121	KY	Knox County, Kentucky	31,765	7.9
21131	KY	Leslie County, Kentucky	11,470	8.5
21137	KY	Lincoln County, Kentucky	24,779	7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
21141	KY	Logan County, Kentucky	26,838	6.6
21145	KY	McCracken County, Kentucky	65,217	8.3
21151	KY	Madison County, Kentucky	81,580	8.5
21153	KY	Magoffin County, Kentucky	13,294	6.2
21161	KY	Mason County, Kentucky	17,362	7.3
21165	KY	Menifee County, Kentucky	6,427	11.5
21171	KY	Monroe County, Kentucky	11,089	6.7
21173	KY	Montgomery County, Kentucky	25,908	6.3
21197	KY	Powell County, Kentucky	12,786	8.6
21199	KY	Pulaski County, Kentucky	62,062	8.1
21205	KY	Rowan County, Kentucky	23,075	6.1
21209	KY	Scott County, Kentucky	44,868	8.8
21213	KY	Simpson County, Kentucky	17,214	9.3
21217	KY	Taylor County, Kentucky	24,247	6.6
21219	KY	Todd County, Kentucky	12,307	7
21227	KY	Warren County, Kentucky	109,775	7.4
21231	KY	Wayne County, Kentucky	20,716	6.8
21235	KY	Whitley County, Kentucky	36,006	8.7
22001	LA	Acadia Parish, Louisiana	61,139	6.1
22009	LA	Avoyelles Parish, Louisiana	42,013	8.2
22013	LA	Bienville Parish, Louisiana	14,546	6.8
22015	LA	Bossier Parish, Louisiana	113,837	6.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
22017	LA	Caddo Parish, Louisiana	253,048	9.2
22019	LA	Calcasieu Parish, Louisiana	189,134	6.3
22031	LA	De Soto Parish, Louisiana	26,465	7.2
22033	LA	East Baton Rouge Parish, Louisiana	435,815	8.3
22035	LA	East Carroll Parish, Louisiana	7,964	7
22039	LA	Evangeline Parish, Louisiana	34,419	11.8
22045	LA	Iberia Parish, Louisiana	73,395	7.5
22051	LA	Jefferson Parish, Louisiana	431,019	8.1
22053	LA	Jefferson Davis Parish, Louisiana	31,500	6.3
22055	LA	Lafayette Parish, Louisiana	215,581	6.4
22065	LA	Madison Parish, Louisiana	12,286	6.3
22069	LA	Natchitoches Parish, Louisiana	39,274	7
22071	LA	Orleans Parish, Louisiana	295,285	16.2
22073	LA	Ouachita Parish, Louisiana	152,207	8.8
22079	LA	Rapides Parish, Louisiana	130,800	7.5
22087	LA	St. Bernard Parish, Louisiana	27,739	6.2
22097	LA	St. Landry Parish, Louisiana	84,309	8.6
22103	LA	St. Tammany Parish, Louisiana	228,894	6.5
22117	LA	Washington Parish, Louisiana	46,578	6.3
22119	LA	Webster Parish, Louisiana	41,238	8.3
22125	LA	West Feliciana Parish, Louisiana	15,681	6.5
23001	ME	Androscoggin County, Maine	107,882	10

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
23003	ME	Aroostook County, Maine	72,412	7.6
23005	ME	Cumberland County, Maine	279,994	9.9
23011	ME	Kennebec County, Maine	121,925	8.1
23013	ME	Knox County, Maine	40,111	6.9
23019	ME	Penobscot County, Maine	152,934	9.7
23023	ME	Sagadahoc County, Maine	35,688	8.3
23025	ME	Somerset County, Maine	52,261	9.3
23031	ME	York County, Maine	197,457	9.1
24005	MD	Baltimore County, Maryland	799,195	12
24009	MD	Calvert County, Maryland	87,891	6.7
24011	MD	Caroline County, Maryland	32,805	6.9
24013	MD	Carroll County, Maryland	167,208	7.5
24015	MD	Cecil County, Maryland	100,139	7.9
24017	MD	Charles County, Maryland	143,912	8.1
24019	MD	Dorchester County, Maryland	32,287	7.5
24021	MD	Frederick County, Maryland	229,205	7.9
24023	MD	Garrett County, Maryland	30,145	6.8
24025	MD	Harford County, Maryland	242,888	6.1
24027	MD	Howard County, Maryland	279,366	8.7
24029	MD	Kent County, Maryland	20,018	7.6
24031	MD	Montgomery County, Maryland	947,230	9
24033	MD	Prince George's County, Maryland	854,722	10.1

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
24041	MD	Talbot County, Maryland	37,361	6.3
24043	MD	Washington County, Maryland	146,329	9.9
24045	MD	Wicomico County, Maryland	96,951	10.6
24510	MD	Baltimore city, Maryland	620,538	17.6
25003	MA	Berkshire County, Massachusetts	131,528	10.3
25005	MA	Bristol County, Massachusetts	546,433	14
25009	MA	Essex County, Massachusetts	735,642	13.2
25013	MA	Hampden County, Massachusetts	462,270	12
25015	MA	Hampshire County, Massachusetts	157,326	7.2
25017	MA	Middlesex County, Massachusetts	1,479,491	11.6
25019	MA	Nantucket County, Massachusetts	10,069	6.1
25021	MA	Norfolk County, Massachusetts	662,077	9.6
25023	MA	Plymouth County, Massachusetts	490,784	7.1
25025	MA	Suffolk County, Massachusetts	704,460	23.3
25027	MA	Worcester County, Massachusetts	791,855	11.9
26003	MI	Alger County, Michigan	9,604	7.9
26013	MI	Baraga County, Michigan	8,882	6.2
26017	MI	Bay County, Michigan	108,156	6.4
26021	MI	Berrien County, Michigan	157,232	7.4
26025	MI	Calhoun County, Michigan	137,112	8
26033	MI	Chippewa County, Michigan	39,078	7.8
26041	MI	Delta County, Michigan	37,403	6.5

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
26045	MI	Eaton County, Michigan	108,002	8.2
26049	MI	Genesee County, Michigan	433,054	7.6
26065	MI	Ingham County, Michigan	281,365	10.3
26067	MI	Ionia County, Michigan	64,651	7.4
26073	MI	Isabella County, Michigan	69,451	6.4
26075	MI	Jackson County, Michigan	161,569	8.6
26077	MI	Kalamazoo County, Michigan	247,246	8.9
26081	MI	Kent County, Michigan	599,432	8.9
26091	MI	Lenawee County, Michigan	100,911	6.1
26099	MI	Macomb County, Michigan	837,490	7.6
26103	MI	Marquette County, Michigan	66,514	10.4
26111	MI	Midland County, Michigan	83,626	9.9
26115	MI	Monroe County, Michigan	152,784	6.1
26117	MI	Montcalm County, Michigan	63,553	7.4
26121	MI	Muskegon County, Michigan	173,223	8.2
26125	MI	Oakland County, Michigan	1,201,113	9.1
26139	MI	Ottawa County, Michigan	261,376	7.3
26145	MI	Saginaw County, Michigan	202,336	7.5
26147	MI	St. Clair County, Michigan	165,719	7.5
26149	MI	St. Joseph County, Michigan	61,848	6.9
26155	MI	Shiawassee County, Michigan	71,621	7.9
26159	MI	Van Buren County, Michigan	76,585	6.1

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
26161	MI	Washtenaw County, Michigan	343,947	9.5
26163	MI	Wayne County, Michigan	1,870,362	10.7
27003	MN	Anoka County, Minnesota	327,544	8.8
27005	MN	Becker County, Minnesota	32,274	7.6
27009	MN	Benton County, Minnesota	38,148	12.9
27011	MN	Big Stone County, Minnesota	5,324	11.4
27013	MN	Blue Earth County, Minnesota	62,719	7.8
27015	MN	Brown County, Minnesota	26,030	10.9
27017	MN	Carlton County, Minnesota	34,958	8
27019	MN	Carver County, Minnesota	88,668	7.8
27023	MN	Chippewa County, Minnesota	12,426	14.9
27025	MN	Chisago County, Minnesota	52,844	8.5
27027	MN	Clay County, Minnesota	57,089	11.6
27029	MN	Clearwater County, Minnesota	8,593	7.9
27033	MN	Cottonwood County, Minnesota	11,712	9.1
27035	MN	Crow Wing County, Minnesota	61,836	7.6
27037	MN	Dakota County, Minnesota	393,380	10.3
27041	MN	Douglas County, Minnesota	35,909	7.2
27043	MN	Faribault County, Minnesota	14,819	6.8
27045	MN	Fillmore County, Minnesota	20,978	8.8
27047	MN	Freeborn County, Minnesota	31,387	7.7
27049	MN	Goodhue County, Minnesota	45,930	9.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
27051	MN	Grant County, Minnesota	6,082	10.7
27053	MN	Hennepin County, Minnesota	1,136,522	12
27059	MN	Isanti County, Minnesota	37,682	8.3
27061	MN	Itasca County, Minnesota	44,835	6.9
27065	MN	Kanabec County, Minnesota	16,379	8.3
27067	MN	Kandiyohi County, Minnesota	41,869	7.7
27071	MN	Koochiching County, Minnesota	13,461	6.5
27083	MN	Lyon County, Minnesota	25,606	14.4
27085	MN	McLeod County, Minnesota	36,789	7.2
27089	MN	Marshall County, Minnesota	9,580	9.4
27091	MN	Martin County, Minnesota	20,865	9.1
27093	MN	Meeker County, Minnesota	23,371	7.7
27095	MN	Mille Lacs County, Minnesota	26,075	10.6
27097	MN	Morrison County, Minnesota	33,093	6.8
27099	MN	Mower County, Minnesota	38,855	10.6
27103	MN	Nicollet County, Minnesota	32,271	9.4
27107	MN	Norman County, Minnesota	6,865	10.5
27109	MN	Olmsted County, Minnesota	141,244	9.4
27111	MN	Otter Tail County, Minnesota	57,539	8.5
27113	MN	Pennington County, Minnesota	13,862	8.4
27117	MN	Pipestone County, Minnesota	9,570	11.2
27119	MN	Polk County, Minnesota	31,336	10.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
27121	MN	Pope County, Minnesota	11,064	8.5
27123	MN	Ramsey County, Minnesota	503,113	13.4
27127	MN	Redwood County, Minnesota	16,069	6.8
27129	MN	Renville County, Minnesota	16,007	8.4
27131	MN	Rice County, Minnesota	63,087	6.2
27133	MN	Rock County, Minnesota	9,606	9.3
27135	MN	Roseau County, Minnesota	15,864	6.9
27137	MN	St. Louis County, Minnesota	199,472	8.8
27139	MN	Scott County, Minnesota	126,139	7.9
27141	MN	Sherburne County, Minnesota	86,823	9.5
27145	MN	Stearns County, Minnesota	147,927	9.2
27147	MN	Steele County, Minnesota	36,434	9.7
27149	MN	Stevens County, Minnesota	9,711	6.2
27151	MN	Swift County, Minnesota	9,946	9.5
27157	MN	Wabasha County, Minnesota	21,743	8.4
27159	MN	Wadena County, Minnesota	13,809	14.8
27161	MN	Waseca County, Minnesota	19,168	6.5
27163	MN	Washington County, Minnesota	232,536	9.8
27167	MN	Wilkin County, Minnesota	6,636	6.3
27169	MN	Winona County, Minnesota	51,304	6.1
27171	MN	Wright County, Minnesota	120,764	6.6
28001	MS	Adams County, Mississippi	32,659	10.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
28011	MS	Bolivar County, Mississippi	35,063	9.4
28013	MS	Calhoun County, Mississippi	14,945	6.2
28017	MS	Chickasaw County, Mississippi	17,689	7.8
28027	MS	Coahoma County, Mississippi	26,681	11.4
28035	MS	Forrest County, Mississippi	74,290	8.7
28037	MS	Franklin County, Mississippi	8,130	7.1
28043	MS	Grenada County, Mississippi	22,169	8
28047	MS	Harrison County, Mississippi	181,791	6.5
28049	MS	Hinds County, Mississippi	246,067	9.2
28053	MS	Humphreys County, Mississippi	9,610	8.1
28057	MS	Itawamba County, Mississippi	23,329	6.1
28075	MS	Lauderdale County, Mississippi	79,405	8.8
28081	MS	Lee County, Mississippi	81,446	7
28083	MS	Leflore County, Mississippi	33,109	14.7
28085	MS	Lincoln County, Mississippi	34,622	6.5
28087	MS	Lowndes County, Mississippi	59,482	9
28089	MS	Madison County, Mississippi	91,987	8.2
28091	MS	Marion County, Mississippi	26,758	6.5
28099	MS	Neshoba County, Mississippi	29,545	6.1
28103	MS	Noxubee County, Mississippi	11,747	9.3
28105	MS	Oktibbeha County, Mississippi	46,529	9.4
28113	MS	Pike County, Mississippi	40,284	7.2

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
28119	MS	Quitman County, Mississippi	8,551	7.5
28133	MS	Sunflower County, Mississippi	30,504	10.8
28137	MS	Tate County, Mississippi	28,198	8.9
28145	MS	Union County, Mississippi	26,922	6.6
28149	MS	Warren County, Mississippi	48,890	8.5
28151	MS	Washington County, Mississippi	52,455	8.5
28155	MS	Webster County, Mississippi	10,139	8.1
28163	MS	Yazoo County, Mississippi	28,402	9
29001	MO	Adair County, Missouri	25,315	9
29003	MO	Andrew County, Missouri	17,006	7.4
29007	MO	Audrain County, Missouri	25,684	8.2
29019	MO	Boone County, Missouri	158,067	8.5
29021	MO	Buchanan County, Missouri	88,195	10.1
29023	MO	Butler County, Missouri	42,437	8.7
29025	MO	Caldwell County, Missouri	9,380	9.3
29031	MO	Cape Girardeau County, Missouri	74,283	6.6
29037	MO	Cass County, Missouri	97,598	7.9
29047	MO	Clay County, Missouri	215,015	7
29061	MO	Daviess County, Missouri	8,359	6.7
29063	MO	DeKalb County, Missouri	12,872	9.3
29065	MO	Dent County, Missouri	15,497	6.3
29069	MO	Dunklin County, Missouri	32,140	8.9

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
29075	MO	Gentry County, Missouri	6,760	6.1
29077	MO	Greene County, Missouri	270,190	8.8
29079	MO	Grundy County, Missouri	10,214	8.7
29083	MO	Henry County, Missouri	22,373	6.4
29091	MO	Howell County, Missouri	39,763	9.8
29095	MO	Jackson County, Missouri	666,997	11.5
29097	MO	Jasper County, Missouri	115,029	9.2
29109	MO	Lawrence County, Missouri	38,373	7.4
29115	MO	Linn County, Missouri	12,824	9.9
29117	MO	Livingston County, Missouri	14,961	11.4
29123	MO	Madison County, Missouri	12,269	8.2
29127	MO	Marion County, Missouri	28,579	8.5
29129	MO	Mercer County, Missouri	3,731	6.6
29131	MO	Miller County, Missouri	24,805	10.5
29133	MO	Mississippi County, Missouri	14,143	6.8
29143	MO	New Madrid County, Missouri	18,847	7.9
29145	MO	Newton County, Missouri	57,561	7
29147	MO	Nodaway County, Missouri	23,031	7.2
29155	MO	Pemiscot County, Missouri	18,587	10.7
29159	MO	Pettis County, Missouri	41,587	8.2
29161	MO	Phelps County, Missouri	44,473	7.6
29163	MO	Pike County, Missouri	18,590	9.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
29165	MO	Platte County, Missouri	86,894	9.9
29167	MO	Polk County, Missouri	30,729	7.1
29169	MO	Pulaski County, Missouri	49,114	6.4
29171	MO	Putnam County, Missouri	5,040	7.8
29183	MO	St. Charles County, Missouri	350,606	6.7
29186	MO	Ste. Genevieve County, Missouri	18,205	7.5
29187	MO	St. Francois County, Missouri	64,239	6.5
29189	MO	St. Louis County, Missouri	999,454	7.6
29195	MO	Saline County, Missouri	23,126	6.5
29197	MO	Schuyler County, Missouri	4,361	6.1
29201	MO	Scott County, Missouri	39,370	7.2
29207	MO	Stoddard County, Missouri	30,089	7.2
29211	MO	Sullivan County, Missouri	6,728	6.3
29217	MO	Vernon County, Missouri	20,917	8.4
29225	MO	Webster County, Missouri	35,678	11.1
29510	MO	St. Louis city, Missouri	318,809	19.3
30013	MT	Cascade County, Montana	80,562	8.8
30019	MT	Daniels County, Montana	1,649	7.1
30023	MT	Deer Lodge County, Montana	9,270	9.4
30029	MT	Flathead County, Montana	89,215	6.8
30035	MT	Glacier County, Montana	13,251	7.5
30037	MT	Golden Valley County, Montana	810	8.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
30041	MT	Hill County, Montana	16,007	7.2
30049	MT	Lewis and Clark County, Montana	61,643	8
30051	MT	Liberty County, Montana	2,261	15.3
30055	MT	McCone County, Montana	1,714	6.9
30061	MT	Mineral County, Montana	4,193	7.9
30063	MT	Missoula County, Montana	107,288	12.1
30067	MT	Park County, Montana	15,752	7.5
30069	MT	Petroleum County, Montana	598	10.4
30073	MT	Pondera County, Montana	6,145	10.6
30077	MT	Powell County, Montana	7,077	7.9
30083	MT	Richland County, Montana	9,498	9.9
30085	MT	Roosevelt County, Montana	10,273	6.6
30091	MT	Sheridan County, Montana	3,505	10.2
30093	MT	Silver Bow County, Montana	33,797	8.7
30099	MT	Teton County, Montana	6,105	7.2
30105	MT	Valley County, Montana	7,345	6.1
30109	MT	Wibaux County, Montana	1,067	6.9
30111	MT	Yellowstone County, Montana	144,050	9.6
31001	NE	Adams County, Nebraska	31,126	11.4
31013	NE	Box Butte County, Nebraska	11,372	6.2
31017	NE	Brown County, Nebraska	3,192	9
31019	NE	Buffalo County, Nebraska	45,437	11.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
31021	NE	Burt County, Nebraska	6,964	7.5
31029	NE	Chase County, Nebraska	3,927	6.4
31031	NE	Cherry County, Nebraska	5,783	16.7
31035	NE	Clay County, Nebraska	6,554	6.8
31043	NE	Dakota County, Nebraska	20,674	8.3
31045	NE	Dawes County, Nebraska	9,149	7.6
31047	NE	Dawson County, Nebraska	24,245	7.5
31053	NE	Dodge County, Nebraska	36,621	11.7
31055	NE	Douglas County, Nebraska	505,545	10.4
31059	NE	Fillmore County, Nebraska	5,953	6.3
31067	NE	Gage County, Nebraska	22,591	7.7
31079	NE	Hall County, Nebraska	56,899	9.4
31081	NE	Hamilton County, Nebraska	9,160	6.4
31089	NE	Holt County, Nebraska	10,479	7.2
31093	NE	Howard County, Nebraska	6,302	6.5
31095	NE	Jefferson County, Nebraska	7,708	8.7
31097	NE	Johnson County, Nebraska	5,211	7.8
31099	NE	Kearney County, Nebraska	6,552	8
31105	NE	Kimball County, Nebraska	3,814	9
31109	NE	Lancaster County, Nebraska	279,428	10
31111	NE	Lincoln County, Nebraska	36,167	8.6
31117	NE	McPherson County, Nebraska	489	7.5

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
31119	NE	Madison County, Nebraska	34,720	10.1
31121	NE	Merrick County, Nebraska	7,784	8.1
31125	NE	Nance County, Nebraska	3,755	9.9
31131	NE	Otoe County, Nebraska	15,741	8.8
31135	NE	Perkins County, Nebraska	2,983	8.8
31137	NE	Phelps County, Nebraska	9,234	10.5
31141	NE	Platte County, Nebraska	31,675	11.2
31145	NE	Red Willow County, Nebraska	11,069	9.2
31147	NE	Richardson County, Nebraska	8,455	8.9
31153	NE	Sarpy County, Nebraska	152,180	9.1
31157	NE	Scotts Bluff County, Nebraska	36,569	9.5
31159	NE	Seward County, Nebraska	16,628	6.3
31173	NE	Thurston County, Nebraska	6,907	6.7
31175	NE	Valley County, Nebraska	4,284	9.4
32001	NV	Churchill County, Nevada	24,946	7.7
32003	NV	Clark County, Nevada	1,895,521	13.4
32007	NV	Elko County, Nevada	47,707	6.6
32009	NV	Esmeralda County, Nevada	892	6.1
32017	NV	Lincoln County, Nevada	5,060	8.3
32019	NV	Lyon County, Nevada	51,515	7.1
32023	NV	Nye County, Nevada	43,878	7.3
32031	NV	Washoe County, Nevada	412,844	12.2

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
32510	NV	Carson City, Nevada	55,375	8.3
33001	NH	Belknap County, New Hampshire	60,142	6.9
33005	NH	Cheshire County, New Hampshire	77,445	6.5
33007	NH	Coos County, New Hampshire	33,445	9.9
33009	NH	Grafton County, New Hampshire	88,356	6.1
33011	NH	Hillsborough County, New Hampshire	399,555	10.6
33013	NH	Merrimack County, New Hampshire	146,785	10.2
33015	NH	Rockingham County, New Hampshire	294,638	8.1
33017	NH	Strafford County, New Hampshire	122,158	10.5
34001	NJ	Atlantic County, New Jersey	273,162	9.8
34003	NJ	Bergen County, New Jersey	896,482	11.1
34005	NJ	Burlington County, New Jersey	447,861	6.9
34007	NJ	Camden County, New Jersey	513,574	13.8
34009	NJ	Cape May County, New Jersey	97,684	6.6
34011	NJ	Cumberland County, New Jersey	155,456	12
34013	NJ	Essex County, New Jersey	780,872	20.9
34015	NJ	Gloucester County, New Jersey	285,223	7.7
34017	NJ	Hudson County, New Jersey	622,123	26.5
34019	NJ	Hunterdon County, New Jersey	128,458	7
34021	NJ	Mercer County, New Jersey	364,445	11.7
34023	NJ	Middlesex County, New Jersey	798,882	10.5
34025	NJ	Monmouth County, New Jersey	628,112	10.3

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
34027	NJ	Morris County, New Jersey	489,811	8.1
34031	NJ	Passaic County, New Jersey	496,204	19.1
34033	NJ	Salem County, New Jersey	65,982	11.8
34035	NJ	Somerset County, New Jersey	319,347	8.2
34037	NJ	Sussex County, New Jersey	149,996	7.5
34039	NJ	Union County, New Jersey	529,547	15.8
34041	NJ	Warren County, New Jersey	108,982	9.8
35001	NM	Bernalillo County, New Mexico	646,881	8.2
35005	NM	Chaves County, New Mexico	64,268	6.4
35013	NM	Doña Ana County, New Mexico	201,670	8.4
35041	NM	Roosevelt County, New Mexico	19,372	6.4
35043	NM	Sandoval County, New Mexico	124,263	6.7
35049	NM	Santa Fe County, New Mexico	141,702	7
35057	NM	Torrance County, New Mexico	16,467	8.2
36001	NY	Albany County, New York	304,032	13.6
36005	NY	Bronx County, New York	1,365,725	36.5
36007	NY	Broome County, New York	200,804	9.8
36009	NY	Cattaraugus County, New York	80,776	7.8
36011	NY	Cayuga County, New York	80,431	8.5
36013	NY	Chautauqua County, New York	135,263	8.5
36015	NY	Chemung County, New York	88,708	7.6
36017	NY	Chenango County, New York	51,045	7.1

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
36019	NY	Clinton County, New York	82,380	8.6
36021	NY	Columbia County, New York	63,241	6.3
36023	NY	Cortland County, New York	49,452	9.2
36027	NY	Dutchess County, New York	296,152	11.5
36029	NY	Erie County, New York	921,202	11.3
36031	NY	Essex County, New York	39,416	6.6
36033	NY	Franklin County, New York	51,697	7.3
36035	NY	Fulton County, New York	55,497	11.3
36037	NY	Genesee County, New York	59,952	8.1
36039	NY	Greene County, New York	49,410	6.7
36043	NY	Herkimer County, New York	64,332	9.6
36045	NY	Jefferson County, New York	115,069	6.7
36047	NY	Kings County, New York	2,466,782	32.3
36049	NY	Lewis County, New York	27,017	6.2
36051	NY	Livingston County, New York	65,441	6.4
36053	NY	Madison County, New York	72,887	6.1
36055	NY	Monroe County, New York	741,274	12.5
36057	NY	Montgomery County, New York	49,945	9.7
36059	NY	Nassau County, New York	1,329,083	6.6
36061	NY	New York County, New York	1,583,345	33.3
36063	NY	Niagara County, New York	216,064	10
36065	NY	Oneida County, New York	234,533	8.2

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
36067	NY	Onondaga County, New York	463,704	10.6
36069	NY	Ontario County, New York	106,298	10.4
36071	NY	Orange County, New York	370,201	12.9
36073	NY	Orleans County, New York	43,169	9.2
36075	NY	Oswego County, New York	122,220	9.2
36077	NY	Otsego County, New York	62,604	7.3
36079	NY	Putnam County, New York	99,545	7.6
36081	NY	Queens County, New York	2,199,169	21.6
36083	NY	Rensselaer County, New York	158,629	9.6
36085	NY	Richmond County, New York	463,450	10.8
36087	NY	Rockland County, New York	305,461	9.6
36089	NY	St. Lawrence County, New York	111,778	8.3
36091	NY	Saratoga County, New York	217,264	9.6
36093	NY	Schenectady County, New York	153,268	11.7
36095	NY	Schoharie County, New York	32,789	11
36099	NY	Seneca County, New York	35,309	7.5
36101	NY	Steuben County, New York	98,724	7.9
36103	NY	Suffolk County, New York	1,482,548	8
36105	NY	Sullivan County, New York	77,625	8.3
36109	NY	Tompkins County, New York	100,612	8.4
36111	NY	Ulster County, New York	182,782	9.8
36113	NY	Warren County, New York	65,707	10.5

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
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36115	NY	Washington County, New York	63,088	10.2
36117	NY	Wayne County, New York	93,654	9.8
36119	NY	Westchester County, New York	939,406	13.5
36121	NY	Wyoming County, New York	42,367	6.7
37001	NC	Alamance County, North Carolina	147,072	8.3
37007	NC	Anson County, North Carolina	26,785	7.8
37013	NC	Beaufort County, North Carolina	47,185	6.6
37025	NC	Cabarrus County, North Carolina	169,990	6.4
37035	NC	Catawba County, North Carolina	153,149	6.3
37041	NC	Chowan County, North Carolina	14,859	9.4
37045	NC	Cleveland County, North Carolina	97,786	7.7
37047	NC	Columbus County, North Carolina	56,856	6.5
37049	NC	Craven County, North Carolina	100,001	8.7
37051	NC	Cumberland County, North Carolina	312,994	7.9
37057	NC	Davidson County, North Carolina	160,638	6.7
37061	NC	Duplin County, North Carolina	56,657	6.1
37063	NC	Durham County, North Carolina	258,578	11
37065	NC	Edgecombe County, North Carolina	56,247	11.7
37067	NC	Forsyth County, North Carolina	342,989	7.6
37069	NC	Franklin County, North Carolina	58,473	6.6
37071	NC	Gaston County, North Carolina	202,642	8.5
37077	NC	Granville County, North Carolina	58,071	8.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
37079	NC	Greene County, North Carolina	21,157	8.1
37081	NC	Guilford County, North Carolina	475,786	8
37083	NC	Halifax County, North Carolina	55,293	10.9
37085	NC	Harnett County, North Carolina	109,031	7.8
37093	NC	Hoke County, North Carolina	44,128	6.8
37101	NC	Johnston County, North Carolina	160,675	7.3
37105	NC	Lee County, North Carolina	55,576	8.2
37107	NC	Lenoir County, North Carolina	59,307	12
37115	NC	Madison County, North Carolina	20,549	6.4
37117	NC	Martin County, North Carolina	24,471	10
37119	NC	Mecklenburg County, North Carolina	882,761	9.7
37125	NC	Moore County, North Carolina	85,914	6.5
37127	NC	Nash County, North Carolina	94,402	13
37129	NC	New Hanover County, North Carolina	197,272	7.7
37135	NC	Orange County, North Carolina	129,562	7.1
37139	NC	Pasquotank County, North Carolina	40,167	7.3
37145	NC	Person County, North Carolina	38,942	7.4
37147	NC	Pitt County, North Carolina	161,385	11.1
37149	NC	Polk County, North Carolina	20,289	8.6
37153	NC	Richmond County, North Carolina	46,477	6.7
37155	NC	Robeson County, North Carolina	131,708	7.6
37157	NC	Rockingham County, North Carolina	93,322	6.5

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
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37161	NC	Rutherford County, North Carolina	66,928	6.4
37163	NC	Sampson County, North Carolina	62,832	6.4
37165	NC	Scotland County, North Carolina	36,325	10.3
37167	NC	Stanly County, North Carolina	60,109	6.8
37171	NC	Surry County, North Carolina	73,287	6.5
37173	NC	Swain County, North Carolina	13,861	6.4
37181	NC	Vance County, North Carolina	44,975	10.2
37183	NC	Wake County, North Carolina	850,546	10.1
37185	NC	Warren County, North Carolina	20,810	7.1
37187	NC	Washington County, North Carolina	13,248	6.5
37191	NC	Wayne County, North Carolina	120,102	8.8
37195	NC	Wilson County, North Carolina	79,533	11.5
38001	ND	Adams County, North Dakota	2,348	10.1
38003	ND	Barnes County, North Dakota	11,056	13
38005	ND	Benson County, North Dakota	6,662	8.4
38009	ND	Bottineau County, North Dakota	6,430	12
38015	ND	Burleigh County, North Dakota	78,776	12.2
38017	ND	Cass County, North Dakota	144,410	18.7
38021	ND	Dickey County, North Dakota	5,340	14.6
38031	ND	Foster County, North Dakota	3,434	7.6
38035	ND	Grand Forks County, North Dakota	66,771	12.4
38043	ND	Kidder County, North Dakota	2,521	9.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
38059	ND	Morton County, North Dakota	26,712	7.6
38067	ND	Pembina County, North Dakota	7,530	6.1
38069	ND	Pierce County, North Dakota	4,364	16.2
38071	ND	Ramsey County, North Dakota	11,371	12.3
38073	ND	Ransom County, North Dakota	5,624	12.6
38077	ND	Richland County, North Dakota	16,507	6.4
38081	ND	Sargent County, North Dakota	3,971	7.9
38083	ND	Sheridan County, North Dakota	1,293	9.2
38089	ND	Stark County, North Dakota	23,486	11
38093	ND	Stutsman County, North Dakota	20,984	9.8
38095	ND	Towner County, North Dakota	2,289	7.1
38097	ND	Traill County, North Dakota	8,190	11.9
38099	ND	Walsh County, North Dakota	11,286	10.4
38101	ND	Ward County, North Dakota	59,461	10.9
38105	ND	Williams County, North Dakota	21,194	8
39001	OH	Adams County, Ohio	28,578	7.4
39003	OH	Allen County, Ohio	106,586	8.7
39005	OH	Ashland County, Ohio	53,341	6.5
39007	OH	Ashtabula County, Ohio	101,867	7.4
39011	OH	Auglaize County, Ohio	46,023	8.9
39013	OH	Belmont County, Ohio	70,403	6.7
39015	OH	Brown County, Ohio	44,618	6.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
39017	OH	Butler County, Ohio	363,465	8.4
39023	OH	Clark County, Ohio	139,374	7.2
39025	OH	Clermont County, Ohio	195,312	7.7
39027	OH	Clinton County, Ohio	42,416	10.7
39029	OH	Columbiana County, Ohio	108,609	6.3
39031	OH	Coshocton County, Ohio	37,046	6.4
39035	OH	Cuyahoga County, Ohio	1,293,825	13
39039	OH	Defiance County, Ohio	39,119	6.4
39043	OH	Erie County, Ohio	77,454	9.4
39045	OH	Fairfield County, Ohio	143,949	6.5
39047	OH	Fayette County, Ohio	28,913	10.4
39049	OH	Franklin County, Ohio	1,141,117	12.4
39053	OH	Gallia County, Ohio	30,943	8.5
39057	OH	Greene County, Ohio	159,940	6.1
39059	OH	Guernsey County, Ohio	40,351	8
39061	OH	Hamilton County, Ohio	802,194	12.7
39063	OH	Hancock County, Ohio	74,670	8.8
39067	OH	Harrison County, Ohio	15,867	8.6
39071	OH	Highland County, Ohio	43,648	7.5
39073	OH	Hocking County, Ohio	29,338	6.6
39079	OH	Jackson County, Ohio	33,165	6.3
39081	OH	Jefferson County, Ohio	70,041	7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
39083	OH	Knox County, Ohio	60,201	7.8
39085	OH	Lake County, Ohio	229,418	7.6
39087	OH	Lawrence County, Ohio	62,647	6.1
39089	OH	Licking County, Ohio	163,708	7.3
39091	OH	Logan County, Ohio	46,006	8.7
39093	OH	Lorain County, Ohio	299,605	6.6
39095	OH	Lucas County, Ohio	444,046	9.9
39097	OH	Madison County, Ohio	42,844	8.7
39099	OH	Mahoning County, Ohio	241,899	7.4
39101	OH	Marion County, Ohio	66,530	6.9
39103	OH	Medina County, Ohio	170,137	7.2
39107	OH	Mercer County, Ohio	40,958	7.6
39109	OH	Miami County, Ohio	102,315	7.9
39113	OH	Montgomery County, Ohio	538,461	10
39119	OH	Muskingum County, Ohio	85,951	7.7
39121	OH	Noble County, Ohio	14,634	8.5
39125	OH	Paulding County, Ohio	19,679	7
39127	OH	Perry County, Ohio	35,843	6.5
39129	OH	Pickaway County, Ohio	55,128	8.2
39131	OH	Pike County, Ohio	28,674	8.5
39139	OH	Richland County, Ohio	125,980	7.2
39143	OH	Sandusky County, Ohio	61,284	7.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
39145	OH	Scioto County, Ohio	78,988	8.8
39147	OH	Seneca County, Ohio	57,091	6.2
39149	OH	Shelby County, Ohio	49,350	7.2
39151	OH	Stark County, Ohio	376,346	8.2
39153	OH	Summit County, Ohio	543,150	9.4
39155	OH	Trumbull County, Ohio	212,780	6.2
39157	OH	Tuscarawas County, Ohio	92,508	8.4
39167	OH	Washington County, Ohio	62,066	6.1
39169	OH	Wayne County, Ohio	114,438	6.6
39173	OH	Wood County, Ohio	125,295	6.2
39175	OH	Wyandot County, Ohio	22,665	7
40013	OK	Bryan County, Oklahoma	41,195	6.9
40017	OK	Canadian County, Oklahoma	109,814	6.9
40021	OK	Cherokee County, Oklahoma	46,182	6.1
40027	OK	Cleveland County, Oklahoma	246,831	7
40029	OK	Coal County, Oklahoma	5,801	7.5
40031	OK	Comanche County, Oklahoma	119,902	6.3
40039	OK	Custer County, Oklahoma	26,824	7.1
40047	OK	Garfield County, Oklahoma	59,093	6.6
40075	OK	Kiowa County, Oklahoma	9,540	8.9
40077	OK	Latimer County, Oklahoma	11,015	6.2
40101	OK	Muskogee County, Oklahoma	70,383	8.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
40103	OK	Noble County, Oklahoma	11,509	8.3
40109	OK	Oklahoma County, Oklahoma	704,023	8.8
40119	OK	Payne County, Oklahoma	75,687	7
40121	OK	Pittsburg County, Oklahoma	45,417	8.1
40123	OK	Pontotoc County, Oklahoma	36,644	8
40125	OK	Pottawatomie County, Oklahoma	68,751	6.3
40133	OK	Seminole County, Oklahoma	25,224	7.5
40143	OK	Tulsa County, Oklahoma	589,757	9.4
41001	OR	Baker County, Oregon	16,150	9.9
41003	OR	Benton County, Oregon	84,158	8.2
41005	OR	Clackamas County, Oregon	370,479	10.5
41007	OR	Clatsop County, Oregon	36,858	10.6
41009	OR	Columbia County, Oregon	49,006	7.5
41011	OR	Coos County, Oregon	63,319	8.2
41015	OR	Curry County, Oregon	22,411	7.7
41017	OR	Deschutes County, Oregon	154,568	9.1
41019	OR	Douglas County, Oregon	107,209	6.1
41021	OR	Gilliam County, Oregon	1,731	7.9
41025	OR	Harney County, Oregon	7,364	7.5
41027	OR	Hood River County, Oregon	21,706	17.4
41029	OR	Jackson County, Oregon	200,587	8.2
41033	OR	Josephine County, Oregon	82,172	10.3

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
41035	OR	Klamath County, Oregon	66,520	6.9
41039	OR	Lane County, Oregon	347,156	9.4
41041	OR	Lincoln County, Oregon	45,857	9.4
41043	OR	Linn County, Oregon	114,315	9.5
41045	OR	Malheur County, Oregon	31,326	6.8
41047	OR	Marion County, Oregon	309,894	11.1
41049	OR	Morrow County, Oregon	11,112	7.4
41051	OR	Multnomah County, Oregon	712,036	16.1
41053	OR	Polk County, Oregon	73,745	8.7
41057	OR	Tillamook County, Oregon	25,200	8.5
41059	OR	Umatilla County, Oregon	74,804	9.1
41061	OR	Union County, Oregon	25,373	7.4
41065	OR	Wasco County, Oregon	24,695	9
41067	OR	Washington County, Oregon	516,665	14.1
41071	OR	Yamhill County, Oregon	96,930	11.6
42001	PA	Adams County, Pennsylvania	100,839	7.8
42003	PA	Allegheny County, Pennsylvania	1,223,066	11.1
42007	PA	Beaver County, Pennsylvania	171,569	6.2
42011	PA	Berks County, Pennsylvania	407,310	9.4
42013	PA	Blair County, Pennsylvania	127,071	11.1
42017	PA	Bucks County, Pennsylvania	622,859	10.2
42019	PA	Butler County, Pennsylvania	182,554	8.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
42021	PA	Cambria County, Pennsylvania	144,741	6.4
42025	PA	Carbon County, Pennsylvania	64,563	6.1
42027	PA	Centre County, Pennsylvania	151,411	7
42029	PA	Chester County, Pennsylvania	490,571	7.8
42037	PA	Columbia County, Pennsylvania	66,642	7.3
42039	PA	Crawford County, Pennsylvania	89,153	7.2
42041	PA	Cumberland County, Pennsylvania	231,336	8.6
42043	PA	Dauphin County, Pennsylvania	264,823	11.8
42045	PA	Delaware County, Pennsylvania	556,468	10.7
42047	PA	Elk County, Pennsylvania	32,480	6.6
42049	PA	Erie County, Pennsylvania	279,234	9.2
42051	PA	Fayette County, Pennsylvania	138,807	6.3
42055	PA	Franklin County, Pennsylvania	146,558	6.4
42059	PA	Greene County, Pennsylvania	39,003	7
42063	PA	Indiana County, Pennsylvania	88,745	6.9
42065	PA	Jefferson County, Pennsylvania	45,244	6.9
42069	PA	Lackawanna County, Pennsylvania	213,731	10.3
42071	PA	Lancaster County, Pennsylvania	511,250	11.5
42073	PA	Lawrence County, Pennsylvania	91,682	7.6
42075	PA	Lebanon County, Pennsylvania	131,341	9.9
42077	PA	Lehigh County, Pennsylvania	343,946	11.7
42079	PA	Luzerne County, Pennsylvania	319,120	9.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
42081	PA	Lycoming County, Pennsylvania	116,376	12.1
42083	PA	McKean County, Pennsylvania	43,853	8.4
42085	PA	Mercer County, Pennsylvania	117,296	8.7
42087	PA	Mifflin County, Pennsylvania	46,583	7.6
42091	PA	Montgomery County, Pennsylvania	790,497	10.6
42095	PA	Northampton County, Pennsylvania	294,536	8.3
42097	PA	Northumberland County, Pennsylvania	94,099	7.2
42101	PA	Philadelphia County, Pennsylvania	1,504,950	15
42105	PA	Potter County, Pennsylvania	17,583	6.2
42107	PA	Schuylkill County, Pennsylvania	148,288	6.1
42111	PA	Somerset County, Pennsylvania	78,219	6.3
42119	PA	Union County, Pennsylvania	44,866	8.2
42121	PA	Venango County, Pennsylvania	55,320	7
42125	PA	Washington County, Pennsylvania	206,987	6.9
42129	PA	Westmoreland County, Pennsylvania	365,841	6.4
42133	PA	York County, Pennsylvania	428,175	8.6
44001	RI	Bristol County, Rhode Island	50,501	10.6
44003	RI	Kent County, Rhode Island	167,235	10.7
44005	RI	Newport County, Rhode Island	83,253	11.2
44007	RI	Providence County, Rhode Island	628,413	15
44009	RI	Washington County, Rhode Island	126,987	6.6
45007	SC	Anderson County, South Carolina	183,691	7.3

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
45009	SC	Bamberg County, South Carolina	16,139	6.2
45019	SC	Charleston County, South Carolina	342,434	8.7
45021	SC	Cherokee County, South Carolina	54,832	7.8
45025	SC	Chesterfield County, South Carolina	46,087	6.5
45027	SC	Clarendon County, South Carolina	34,621	6.8
45031	SC	Darlington County, South Carolina	68,602	7.1
45041	SC	Florence County, South Carolina	134,897	7.9
45043	SC	Georgetown County, South Carolina	60,236	7.6
45045	SC	Greenville County, South Carolina	436,437	8
45047	SC	Greenwood County, South Carolina	68,890	8.1
45059	SC	Laurens County, South Carolina	67,026	6.6
45067	SC	Marion County, South Carolina	33,568	8.5
45075	SC	Orangeburg County, South Carolina	92,475	7.4
45079	SC	Richland County, South Carolina	372,597	8.4
45083	SC	Spartanburg County, South Carolina	278,167	7
45085	SC	Sumter County, South Carolina	106,601	6.2
45087	SC	Union County, South Carolina	29,089	7.1
45091	SC	York County, South Carolina	214,916	6.9
46005	SD	Beadle County, South Dakota	16,829	12.8
46007	SD	Bennett County, South Dakota	3,441	12.1
46011	SD	Brookings County, South Dakota	31,250	8
46013	SD	Brown County, South Dakota	36,011	10.2

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
46015	SD	Brule County, South Dakota	5,128	11.5
46017	SD	Buffalo County, South Dakota	1,932	19.8
46029	SD	Codington County, South Dakota	27,040	12.8
46031	SD	Corson County, South Dakota	4,053	9.6
46035	SD	Davison County, South Dakota	19,397	18.3
46043	SD	Douglas County, South Dakota	3,046	6.7
46045	SD	Edmunds County, South Dakota	4,047	6.7
46047	SD	Fall River County, South Dakota	7,078	13.3
46049	SD	Faulk County, South Dakota	2,386	7
46051	SD	Grant County, South Dakota	7,382	6.2
46059	SD	Hand County, South Dakota	3,402	6.6
46065	SD	Hughes County, South Dakota	16,827	8
46067	SD	Hutchinson County, South Dakota	7,388	7.3
46073	SD	Jerauld County, South Dakota	2,038	9.8
46079	SD	Lake County, South Dakota	11,008	8.7
46081	SD	Lawrence County, South Dakota	23,670	8.6
46083	SD	Lincoln County, South Dakota	41,289	13.9
46089	SD	McPherson County, South Dakota	2,506	8.1
46091	SD	Marshall County, South Dakota	4,618	8.2
46099	SD	Minnehaha County, South Dakota	165,799	14.8
46103	SD	Pennington County, South Dakota	97,922	9.8
46105	SD	Perkins County, South Dakota	2,976	8.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
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46109	SD	Roberts County, South Dakota	10,033	8
46113	SD	Shannon County, South Dakota	13,437	8.6
46115	SD	Spink County, South Dakota	6,518	8.2
46127	SD	Union County, South Dakota	13,903	7.1
46135	SD	Yankton County, South Dakota	22,216	15.6
46137	SD	Ziebach County, South Dakota	2,765	9
47001	TN	Anderson County, Tennessee	74,257	7.6
47003	TN	Bedford County, Tennessee	44,172	6.2
47011	TN	Bradley County, Tennessee	97,192	8.3
47013	TN	Campbell County, Tennessee	40,623	6.2
47031	TN	Coffee County, Tennessee	52,344	7.6
47037	TN	Davidson County, Tennessee	612,884	10.8
47039	TN	Decatur County, Tennessee	11,716	9.7
47043	TN	Dickson County, Tennessee	48,712	8.3
47045	TN	Dyer County, Tennessee	38,174	12.3
47053	TN	Gibson County, Tennessee	49,015	11.2
47055	TN	Giles County, Tennessee	29,558	10
47063	TN	Hamblen County, Tennessee	61,857	6.3
47065	TN	Hamilton County, Tennessee	328,960	9
47069	TN	Hardeman County, Tennessee	27,655	8.9
47075	TN	Haywood County, Tennessee	19,010	10.4
47093	TN	Knox County, Tennessee	423,748	7.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
47095	TN	Lake County, Tennessee	7,827	7.2
47097	TN	Lauderdale County, Tennessee	27,745	10.6
47099	TN	Lawrence County, Tennessee	41,319	7.1
47103	TN	Lincoln County, Tennessee	32,885	6.1
47113	TN	Madison County, Tennessee	97,378	8.3
47125	TN	Montgomery County, Tennessee	163,603	6.4
47143	TN	Rhea County, Tennessee	31,215	7
47149	TN	Rutherford County, Tennessee	250,517	6.8
47151	TN	Scott County, Tennessee	22,171	7.4
47157	TN	Shelby County, Tennessee	922,696	10.8
47161	TN	Stewart County, Tennessee	13,133	7.4
47165	TN	Sumner County, Tennessee	155,592	7.7
47169	TN	Trousdale County, Tennessee	7,751	7
48001	TX	Anderson County, Texas	58,016	6.1
48005	TX	Angelina County, Texas	85,254	6.1
48013	TX	Atascosa County, Texas	44,049	6.2
48021	TX	Bastrop County, Texas	72,289	7.5
48023	TX	Baylor County, Texas	3,795	9.5
48027	TX	Bell County, Texas	294,689	8.2
48029	TX	Bexar County, Texas	1,650,052	8.9
48037	TX	Bowie County, Texas	91,399	7.1
48039	TX	Brazoria County, Texas	300,522	6.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
48041	TX	Brazos County, Texas	185,426	6.7
48045	TX	Briscoe County, Texas	1,723	10.7
48049	TX	Brown County, Texas	38,199	7.1
48053	TX	Burnet County, Texas	42,215	7.4
48055	TX	Caldwell County, Texas	37,416	9
48061	TX	Cameron County, Texas	393,566	8
48063	TX	Camp County, Texas	12,288	6.8
48075	TX	Childress County, Texas	7,115	6.1
48085	TX	Collin County, Texas	738,745	9.4
48087	TX	Collingsworth County, Texas	3,009	8.7
48093	TX	Comanche County, Texas	13,863	8
48097	TX	Cooke County, Texas	38,316	6.1
48105	TX	Crockett County, Texas	3,746	6.8
48109	TX	Culberson County, Texas	2,480	9.1
48113	TX	Dallas County, Texas	2,321,014	11.7
48117	TX	Deaf Smith County, Texas	19,054	7
48119	TX	Delta County, Texas	5,248	7.4
48121	TX	Denton County, Texas	628,084	7.5
48135	TX	Ector County, Texas	133,015	8.2
48139	TX	Ellis County, Texas	143,502	7.1
48141	TX	El Paso County, Texas	772,280	10.2
48153	TX	Floyd County, Texas	6,599	7.5

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
48161	TX	Freestone County, Texas	19,461	8.2
48165	TX	Gaines County, Texas	16,658	6.7
48167	TX	Galveston County, Texas	286,326	8.6
48181	TX	Grayson County, Texas	119,111	7.8
48183	TX	Gregg County, Texas	119,525	8.8
48189	TX	Hale County, Texas	36,041	8
48201	TX	Harris County, Texas	3,950,999	11.7
48209	TX	Hays County, Texas	146,439	8.4
48215	TX	Hidalgo County, Texas	736,973	7.6
48217	TX	Hill County, Texas	34,854	8.1
48219	TX	Hockley County, Texas	22,933	7.4
48223	TX	Hopkins County, Texas	34,540	6.1
48225	TX	Houston County, Texas	23,642	6.9
48227	TX	Howard County, Texas	34,285	7.5
48231	TX	Hunt County, Texas	84,836	10
48245	TX	Jefferson County, Texas	249,349	7.4
48257	TX	Kaufman County, Texas	98,402	7.6
48259	TX	Kendall County, Texas	31,515	10.5
48273	TX	Kleberg County, Texas	31,611	6.2
48277	TX	Lamar County, Texas	49,536	10.7
48281	TX	Lampasas County, Texas	19,677	6.4
48283	TX	La Salle County, Texas	6,709	8.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
48291	TX	Liberty County, Texas	74,922	6.3
48303	TX	Lubbock County, Texas	269,932	8.7
48309	TX	McLennan County, Texas	229,587	8.5
48321	TX	Matagorda County, Texas	36,647	6.8
48323	TX	Maverick County, Texas	52,493	9
48325	TX	Medina County, Texas	45,073	6.1
48337	TX	Montague County, Texas	19,789	6.8
48339	TX	Montgomery County, Texas	427,717	6.7
48343	TX	Morris County, Texas	13,077	6.2
48347	TX	Nacogdoches County, Texas	63,141	6.9
48353	TX	Nolan County, Texas	14,990	10.8
48355	TX	Nueces County, Texas	334,370	9.2
48363	TX	Palo Pinto County, Texas	27,927	9
48365	TX	Panola County, Texas	23,569	6.3
48367	TX	Parker County, Texas	112,158	6.6
48371	TX	Pecos County, Texas	15,400	6.4
48375	TX	Potter County, Texas	120,124	12.1
48377	TX	Presidio County, Texas	7,703	7.2
48395	TX	Robertson County, Texas	16,574	7.6
48399	TX	Runnels County, Texas	10,492	6.5
48409	TX	San Patricio County, Texas	66,100	9.1
48423	TX	Smith County, Texas	203,393	6.3

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
48427	TX	Starr County, Texas	59,989	6.4
48429	TX	Stephens County, Texas	9,562	12.6
48437	TX	Swisher County, Texas	7,828	6.8
48439	TX	Tarrant County, Texas	1,743,300	10.1
48441	TX	Taylor County, Texas	129,477	9.4
48443	TX	Terrell County, Texas	850	6.7
48445	TX	Terry County, Texas	12,498	13.4
48451	TX	Tom Green County, Texas	108,000	7.3
48453	TX	Travis County, Texas	979,712	10.3
48465	TX	Val Verde County, Texas	48,088	12.2
48467	TX	Van Zandt County, Texas	52,362	7
48469	TX	Victoria County, Texas	85,813	8.6
48477	TX	Washington County, Texas	32,949	8.9
48479	TX	Webb County, Texas	240,346	10.3
48481	TX	Wharton County, Texas	41,036	7.7
48485	TX	Wichita County, Texas	130,976	9.4
48487	TX	Wilbarger County, Texas	13,637	9.4
48491	TX	Williamson County, Texas	391,715	7.7
01001	TX	Zapata County, Texas	13,609	6.8
49001	UT	Beaver County, Utah	6,431	8
49007	UT	Carbon County, Utah	20,765	11.9
49019	UT	Grand County, Utah	8,987	7.8

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
49021	UT	Iron County, Utah	44,439	6.2
49023	UT	Juab County, Utah	9,855	8.4
49025	UT	Kane County, Utah	6,893	6.8
49035	UT	Salt Lake County, Utah	1,000,155	8.6
49045	UT	Tooele County, Utah	55,398	9.9
49057	UT	Weber County, Utah	222,849	6.5
50003	VT	Bennington County, Vermont	37,122	6.8
50005	VT	Caledonia County, Vermont	31,214	8.9
50007	VT	Chittenden County, Vermont	154,729	12.7
50015	VT	Lamoille County, Vermont	24,040	7.9
50019	VT	Orleans County, Vermont	27,256	9.6
50021	VT	Rutland County, Vermont	62,278	7.2
50023	VT	Washington County, Vermont	59,379	8.1
50025	VT	Windham County, Vermont	44,438	9.6
50027	VT	Windsor County, Vermont	56,891	6.8
51003	VA	Albemarle County, Virginia	96,633	7.9
51013	VA	Arlington County, Virginia	197,467	11.6
51027	VA	Buchanan County, Virginia	24,459	6.4
51041	VA	Chesterfield County, Virginia	308,633	7
51043	VA	Clarke County, Virginia	14,013	7.7
51047	VA	Culpeper County, Virginia	45,749	8.9
51049	VA	Cumberland County, Virginia	9,855	6.9

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
51059	VA	Fairfax County, Virginia	1,048,554	6.6
51061	VA	Fauquier County, Virginia	64,546	8.7
51079	VA	Greene County, Virginia	18,082	6.8
51087	VA	Henrico County, Virginia	300,053	10.1
51107	VA	Loudoun County, Virginia	291,653	7.5
51135	VA	Nottoway County, Virginia	15,819	11.9
51139	VA	Page County, Virginia	24,116	7.1
51147	VA	Prince Edward County, Virginia	22,723	6.6
51153	VA	Prince William County, Virginia	379,415	6.2
51155	VA	Pulaski County, Virginia	34,963	7.2
51161	VA	Roanoke County, Virginia	91,583	6.4
51171	VA	Shenandoah County, Virginia	41,468	7
51177	VA	Spotsylvania County, Virginia	120,212	7.6
51183	VA	Sussex County, Virginia	12,167	9.7
51187	VA	Warren County, Virginia	37,044	6.4
51510	VA	Alexandria city, Virginia	133,647	14.6
51515	VA	Bedford city, Virginia	6,177	6.6
51520	VA	Bristol city, Virginia	17,704	13.8
51540	VA	Charlottesville city, Virginia	42,267	13.9
51550	VA	Chesapeake city, Virginia	219,268	10.3
51570	VA	Colonial Heights city, Virginia	17,472	10.8
51580	VA	Covington city, Virginia	5,989	10.4

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
51590	VA	Danville city, Virginia	43,787	14.8
51595	VA	Emporia city, Virginia	5,822	10.2
51610	VA	Falls Church city, Virginia	11,465	11.2
51620	VA	Franklin city, Virginia	8,549	20.1
51630	VA	Fredericksburg city, Virginia	23,375	25.9
51640	VA	Galax city, Virginia	6,936	15
51650	VA	Hampton city, Virginia	139,046	10.1
51660	VA	Harrisonburg city, Virginia	47,406	14.2
51670	VA	Hopewell city, Virginia	22,506	11.8
51678	VA	Lexington city, Virginia	6,990	12.6
51680	VA	Lynchburg city, Virginia	73,726	9.5
51683	VA	Manassas city, Virginia	36,067	16.8
51685	VA	Manassas Park city, Virginia	13,195	19.6
51690	VA	Martinsville city, Virginia	14,029	14.2
51700	VA	Newport News city, Virginia	181,822	14
51710	VA	Norfolk city, Virginia	242,143	15.5
51720	VA	Norton city, Virginia	3,886	18.7
51730	VA	Petersburg city, Virginia	32,303	16.5
51740	VA	Portsmouth city, Virginia	96,785	10.9
51750	VA	Radford city, Virginia	16,318	8.5
51760	VA	Richmond city, Virginia	201,828	19
51770	VA	Roanoke city, Virginia	95,793	13.7

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
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51775	VA	Salem city, Virginia	24,641	10
51790	VA	Staunton city, Virginia	23,806	13.2
51800	VA	Suffolk city, Virginia	82,544	8.9
51810	VA	Virginia Beach city, Virginia	435,996	8.3
51820	VA	Waynesboro city, Virginia	20,885	16.2
51830	VA	Williamsburg city, Virginia	13,421	6.9
51840	VA	Winchester city, Virginia	25,953	11.6
53001	WA	Adams County, Washington	17,884	7.8
53003	WA	Asotin County, Washington	21,363	9.7
53005	WA	Benton County, Washington	167,077	8.6
53007	WA	Chelan County, Washington	70,995	11.2
53009	WA	Clallam County, Washington	70,638	7.6
53011	WA	Clark County, Washington	414,816	10.9
53013	WA	Columbia County, Washington	3,957	12.8
53015	WA	Cowlitz County, Washington	101,244	9.5
53021	WA	Franklin County, Washington	71,329	11.5
53025	WA	Grant County, Washington	85,142	6.3
53031	WA	Jefferson County, Washington	29,574	7.8
53033	WA	King County, Washington	1,879,189	13.1
53035	WA	Kitsap County, Washington	247,336	8.2
53037	WA	Kittitas County, Washington	39,869	11
53039	WA	Klickitat County, Washington	20,055	9

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
53047	WA	Okanogan County, Washington	40,238	6.4
53049	WA	Pacific County, Washington	21,192	7.4
53053	WA	Pierce County, Washington	782,681	11.8
53057	WA	Skagit County, Washington	115,231	7.9
53061	WA	Snohomish County, Washington	694,219	11.1
53063	WA	Spokane County, Washington	461,262	10.9
53067	WA	Thurston County, Washington	243,563	9.8
53071	WA	Walla Walla County, Washington	57,585	11.9
53073	WA	Whatcom County, Washington	195,993	10.7
53075	WA	Whitman County, Washington	43,747	8.4
53077	WA	Yakima County, Washington	236,542	10
54003	WV	Berkeley County, West Virginia	100,910	6.9
54015	WV	Clay County, West Virginia	9,572	7.3
54027	WV	Hampshire County, West Virginia	23,594	9.2
54033	WV	Harrison County, West Virginia	68,490	6.7
54057	WV	Mineral County, West Virginia	27,796	6.3
54065	WV	Morgan County, West Virginia	17,409	12
54069	WV	Ohio County, West Virginia	44,582	6.6
54095	WV	Tyler County, West Virginia	9,339	6.8
54097	WV	Upshur County, West Virginia	23,984	6.4
54103	WV	Wetzel County, West Virginia	16,697	7
54105	WV	Wirt County, West Virginia	5,753	7.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
54107	WV	Wood County, West Virginia	86,731	7.3
55003	WI	Ashland County, Wisconsin	16,212	9.1
55005	WI	Barron County, Wisconsin	45,915	9
55009	WI	Brown County, Wisconsin	244,376	11.5
55011	WI	Buffalo County, Wisconsin	13,744	9
55017	WI	Chippewa County, Wisconsin	61,466	10
55019	WI	Clark County, Wisconsin	34,552	6.3
55021	WI	Columbia County, Wisconsin	56,350	9.1
55023	WI	Crawford County, Wisconsin	16,801	8.4
55025	WI	Dane County, Wisconsin	477,748	11.9
55027	WI	Dodge County, Wisconsin	88,935	11.5
55029	WI	Door County, Wisconsin	27,959	7.3
55031	WI	Douglas County, Wisconsin	43,907	7.8
55033	WI	Dunn County, Wisconsin	43,365	9.5
55035	WI	Eau Claire County, Wisconsin	97,381	10.7
55039	WI	Fond du Lac County, Wisconsin	100,919	10.9
55043	WI	Grant County, Wisconsin	50,716	6.6
55045	WI	Green County, Wisconsin	36,448	6.9
55047	WI	Green Lake County, Wisconsin	19,107	8.5
55051	WI	Iron County, Wisconsin	6,075	9.3
55053	WI	Jackson County, Wisconsin	20,284	6.9
55055	WI	Jefferson County, Wisconsin	82,778	10.2

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
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55057	WI	Juneau County, Wisconsin	26,733	6.2
55059	WI	Kenosha County, Wisconsin	164,328	11.5
55063	WI	La Crosse County, Wisconsin	112,819	12.4
55065	WI	Lafayette County, Wisconsin	16,775	6.1
55067	WI	Langlade County, Wisconsin	20,218	7.3
55069	WI	Lincoln County, Wisconsin	29,075	8.2
55071	WI	Manitowoc County, Wisconsin	81,678	10
55073	WI	Marathon County, Wisconsin	132,644	7.3
55079	WI	Milwaukee County, Wisconsin	937,616	16.9
55081	WI	Monroe County, Wisconsin	44,053	6.9
55087	WI	Outagamie County, Wisconsin	174,457	12.6
55089	WI	Ozaukee County, Wisconsin	85,945	10.2
55093	WI	Pierce County, Wisconsin	40,530	6.1
55095	WI	Polk County, Wisconsin	44,310	7.7
55097	WI	Portage County, Wisconsin	69,437	7.8
55099	WI	Price County, Wisconsin	14,452	6.4
55101	WI	Racine County, Wisconsin	194,736	8.9
55103	WI	Richland County, Wisconsin	18,205	8.4
55105	WI	Rock County, Wisconsin	159,964	10.1
55109	WI	St. Croix County, Wisconsin	82,636	10.7
55111	WI	Sauk County, Wisconsin	60,957	10.8
55117	WI	Sheboygan County, Wisconsin	115,328	10.5

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
55119	WI	Taylor County, Wisconsin	20,557	7
55121	WI	Trempealeau County, Wisconsin	28,523	8.8
55123	WI	Vernon County, Wisconsin	29,460	7.4
55127	WI	Walworth County, Wisconsin	101,735	8.4
55131	WI	Washington County, Wisconsin	130,206	9.5
55133	WI	Waukesha County, Wisconsin	386,130	12.2
55135	WI	Waupaca County, Wisconsin	52,533	11.5
55139	WI	Winnebago County, Wisconsin	165,032	9.3
55141	WI	Wood County, Wisconsin	74,601	8.1
56001	WY	Albany County, Wyoming	34,926	7.9
56009	WY	Converse County, Wyoming	13,404	8
56017	WY	Hot Springs County, Wyoming	4,720	8.4
56025	WY	Natrona County, Wyoming	73,520	9
56027	WY	Niobrara County, Wyoming	2,430	7.1
56029	WY	Park County, Wyoming	27,574	8.3
56033	WY	Sheridan County, Wyoming	28,380	11.1
56041	WY	Uinta County, Wyoming	20,537	9.4
72005	PR	Aguadilla Municipio, Puerto Rico	61,965	8.3
72015	PR	Arroyo Municipio, Puerto Rico	19,607	8.7
72025	PR	Caguas Municipio, Puerto Rico	143,301	6.9
72033	PR	Cataño Municipio, Puerto Rico	28,663	10.3
72035	PR	Cayey Municipio, Puerto Rico	48,255	6.6

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62 + that are low income renters w/ at least one housing problem
72053	PR	Fajardo Municipio, Puerto Rico	37,875	7.8
72071	PR	Isabela Municipio, Puerto Rico	45,681	9.5
72077	PR	Juncos Municipio, Puerto Rico	39,829	6.7
72091	PR	Manatí Municipio, Puerto Rico	44,631	7.2
72095	PR	Maunabo Municipio, Puerto Rico	12,393	6.7
72097	PR	Mayagüez Municipio, Puerto Rico	91,205	9
72103	PR	Naguabo Municipio, Puerto Rico	26,331	6.7
72113	PR	Ponce Municipio, Puerto Rico	170,920	7.9
72115	PR	Quebradillas Municipio, Puerto Rico	25,985	11
72127	PR	San Juan Municipio, Puerto Rico	404,748	10.8
72133	PR	Santa Isabel Municipio, Puerto Rico	23,113	6.1

Table 2.1: SPRAC High Need Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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All SPRAC-Ineligible Counties:

01001	AL	Autauga County, Alabama	53,155	4.5
01003	AL	Baldwin County, Alabama	175,791	5.4
01007	AL	Bibb County, Alabama	22,610	5.4
01009	AL	Blount County, Alabama	56,692	4.3
01015	AL	Calhoun County, Alabama	117,149	4.5
01019	AL	Cherokee County, Alabama	25,700	2.9
01023	AL	Choctaw County, Alabama	14,111	2.5
01025	AL	Clarke County, Alabama	26,255	2.8
01027	AL	Clay County, Alabama	14,040	4.8
01029	AL	Cleburne County, Alabama	14,823	5.4
01031	AL	Coffee County, Alabama	48,349	4.7
01035	AL	Conecuh County, Alabama	13,382	4.3
01037	AL	Coosa County, Alabama	11,470	2.6
01039	AL	Covington County, Alabama	37,608	3.9
01043	AL	Cullman County, Alabama	79,941	4.1
01045	AL	Dale County, Alabama	49,730	4.6
01049	AL	DeKalb County, Alabama	70,038	6
01051	AL	Elmore County, Alabama	77,650	3.6
01053	AL	Escambia County, Alabama	37,996	5.8
01055	AL	Etowah County, Alabama	104,066	5.6
01057	AL	Fayette County, Alabama	17,472	5.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
01061	AL	Geneva County, Alabama	26,541	3.2
01063	AL	Greene County, Alabama	9,255	0.4
01065	AL	Hale County, Alabama	16,168	2.6
01067	AL	Henry County, Alabama	17,148	2.9
01069	AL	Houston County, Alabama	99,029	5.7
01075	AL	Lamar County, Alabama	14,743	5.7
01079	AL	Lawrence County, Alabama	34,235	5.4
01083	AL	Limestone County, Alabama	78,614	3.5
01085	AL	Lowndes County, Alabama	11,731	4
01091	AL	Marengo County, Alabama	21,296	4.8
01093	AL	Marion County, Alabama	30,792	2.4
01095	AL	Marshall County, Alabama	90,867	4.7
01099	AL	Monroe County, Alabama	23,329	3.4
01103	AL	Morgan County, Alabama	117,632	5.4
01107	AL	Pickens County, Alabama	19,917	5.6
01111	AL	Randolph County, Alabama	22,817	2.6
01113	AL	Russell County, Alabama	51,663	5.7
01115	AL	St. Clair County, Alabama	80,658	2.7
01117	AL	Shelby County, Alabama	187,880	3
01119	AL	Sumter County, Alabama	13,871	4.9
01123	AL	Tallapoosa County, Alabama	41,534	4.9
01127	AL	Walker County, Alabama	67,612	3.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
01129	AL	Washington County, Alabama	17,556	1.3
01131	AL	Wilcox County, Alabama	12,012	1.3
01133	AL	Winston County, Alabama	24,687	3.9
02013	AK	Aleutians East Borough, Alaska	3,703	4.7
02068	AK	Denali Borough, Alaska	1,144	0
02070	AK	Dillingham Census Area, Alaska	4,817	1.2
02122	AK	Kenai Peninsula Borough, Alaska	53,917	5.4
02150	AK	Kodiak Island Borough, Alaska	13,349	1.5
02164	AK	Lake and Peninsula Borough, Alaska	1,626	3.5
02180	AK	Nome Census Area, Alaska	9,315	4.6
02198	AK	Prince of Wales-Hyder Census Area, Alaska	5,507	4
02220	AK	Sitka City and Borough, Alaska	8,894	2.5
02230	AK	Skagway Municipality, Alaska	1,140	5.3
02240	AK	Southeast Fairbanks Census Area, Alaska	6,935	4.8
02270	AK	Wade Hampton Census Area, Alaska	7,398	4.7
02275	AK	Wrangell City and Borough, Alaska	2,338	1.4
02282	AK	Yakutat City and Borough, Alaska	638	0
04001	AZ	Apache County, Arizona	70,312	5.7
04007	AZ	Gila County, Arizona	53,272	3.4
04009	AZ	Graham County, Arizona	36,030	3.9
04011	AZ	Greenlee County, Arizona	8,318	3.3
04012	AZ	La Paz County, Arizona	20,549	2.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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04015	AZ	Mohave County, Arizona	199,177	5.7
04017	AZ	Navajo County, Arizona	107,060	4.6
04021	AZ	Pinal County, Arizona	329,297	4.3
04025	AZ	Yavapai County, Arizona	209,260	5.8
04027	AZ	Yuma County, Arizona	190,526	5.3
05003	AR	Ashley County, Arkansas	22,126	5
05005	AR	Baxter County, Arkansas	41,388	5.1
05009	AR	Boone County, Arkansas	36,710	4.7
05013	AR	Calhoun County, Arkansas	5,529	1
05015	AR	Carroll County, Arkansas	26,971	6
05023	AR	Cleburne County, Arkansas	25,692	1.6
05025	AR	Cleveland County, Arkansas	8,769	1.3
05027	AR	Columbia County, Arkansas	24,756	5.7
05029	AR	Conway County, Arkansas	21,059	4.5
05033	AR	Crawford County, Arkansas	60,778	5.6
05047	AR	Franklin County, Arkansas	18,176	3.8
05049	AR	Fulton County, Arkansas	12,263	1.3
05053	AR	Grant County, Arkansas	17,657	4
05055	AR	Greene County, Arkansas	41,318	6
05057	AR	Hempstead County, Arkansas	22,747	1.9
05059	AR	Hot Spring County, Arkansas	32,671	4.3
05065	AR	Izard County, Arkansas	13,636	4.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
05071	AR	Johnson County, Arkansas	25,180	4.1
05073	AR	Lafayette County, Arkansas	7,764	3.2
05079	AR	Lincoln County, Arkansas	14,203	4.7
05081	AR	Little River County, Arkansas	13,145	4.4
05083	AR	Logan County, Arkansas	22,580	1.9
05087	AR	Madison County, Arkansas	15,507	4
05089	AR	Marion County, Arkansas	16,779	2.4
05091	AR	Miller County, Arkansas	43,048	5.9
05097	AR	Montgomery County, Arkansas	9,490	1.4
05099	AR	Nevada County, Arkansas	9,149	3.8
05101	AR	Newton County, Arkansas	8,394	4.8
05103	AR	Ouachita County, Arkansas	26,293	4.9
05105	AR	Perry County, Arkansas	10,435	3.6
05109	AR	Pike County, Arkansas	11,286	5.2
05113	AR	Polk County, Arkansas	20,490	2.3
05115	AR	Pope County, Arkansas	60,460	4.4
05121	AR	Randolph County, Arkansas	18,049	2.1
05125	AR	Saline County, Arkansas	102,439	4.4
05127	AR	Scott County, Arkansas	11,226	5.8
05129	AR	Searcy County, Arkansas	8,227	4
05135	AR	Sharp County, Arkansas	17,432	3
05137	AR	Stone County, Arkansas	12,321	1.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
05139	AR	Union County, Arkansas	42,180	4.3
05141	AR	Van Buren County, Arkansas	17,237	4
05149	AR	Yell County, Arkansas	21,895	5.7
06003	CA	Alpine County, California	1,176	3.4
06005	CA	Amador County, California	38,327	3.5
06009	CA	Calaveras County, California	45,994	3.5
06011	CA	Colusa County, California	21,165	5.5
06017	CA	El Dorado County, California	179,053	5.3
06043	CA	Mariposa County, California	18,290	4
06049	CA	Modoc County, California	9,605	5.3
06051	CA	Mono County, California	13,905	5.4
06057	CA	Nevada County, California	98,186	5.1
06063	CA	Plumas County, California	20,392	5.5
06105	CA	Trinity County, California	13,701	3.8
08007	CO	Archuleta County, Colorado	12,136	2.2
08009	CO	Baca County, Colorado	3,833	3.7
08015	CO	Chaffee County, Colorado	17,540	3.5
08017	CO	Cheyenne County, Colorado	2,194	0
08019	CO	Clear Creek County, Colorado	9,088	1.7
08021	CO	Conejos County, Colorado	8,220	4.7
08023	CO	Costilla County, Colorado	3,536	3.6
08025	CO	Crowley County, Colorado	5,897	5.8

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
08027	CO	Custer County, Colorado	3,899	0.5
08029	CO	Delta County, Colorado	30,533	5.7
08033	CO	Dolores County, Colorado	2,027	0
08035	CO	Douglas County, Colorado	273,440	5.1
08037	CO	Eagle County, Colorado	50,793	5.8
08039	CO	Elbert County, Colorado	22,712	2.3
08047	CO	Gilpin County, Colorado	5,126	2.1
08049	CO	Grand County, Colorado	14,526	3.3
08051	CO	Gunnison County, Colorado	15,136	5.8
08053	CO	Hinsdale County, Colorado	489	0
08057	CO	Jackson County, Colorado	1,464	1.7
08061	CO	Kiowa County, Colorado	1,643	5.4
08063	CO	Kit Carson County, Colorado	8,156	4.6
08065	CO	Lake County, Colorado	7,039	0
08067	CO	La Plata County, Colorado	50,149	3.9
08075	CO	Logan County, Colorado	22,278	5.4
08079	CO	Mineral County, Colorado	1,020	0
08081	CO	Moffat County, Colorado	13,519	5.6
08083	CO	Montezuma County, Colorado	25,279	3.3
08085	CO	Montrose County, Colorado	40,266	5.5
08087	CO	Morgan County, Colorado	27,911	3.7
08091	CO	Ouray County, Colorado	4,319	0

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
08093	CO	Park County, Colorado	16,286	3.2
08095	CO	Phillips County, Colorado	4,394	3.1
08097	CO	Pitkin County, Colorado	16,389	5.3
08103	CO	Rio Blanco County, Colorado	6,494	0.5
08105	CO	Rio Grande County, Colorado	11,926	2.7
08107	CO	Routt County, Colorado	22,924	2
08113	CO	San Miguel County, Colorado	7,299	3.4
08115	CO	Sedgwick County, Colorado	2,412	5.2
08117	CO	Summit County, Colorado	27,105	2.1
08119	CO	Teller County, Colorado	22,821	2.8
08121	CO	Washington County, Colorado	4,773	3.3
08125	CO	Yuma County, Colorado	9,896	4.4
10005	DE	Sussex County, Delaware	190,846	4.2
12003	FL	Baker County, Florida	26,548	5.5
12007	FL	Bradford County, Florida	28,750	3.2
12015	FL	Charlotte County, Florida	159,385	4.4
12017	FL	Citrus County, Florida	140,686	3.5
12019	FL	Clay County, Florida	186,076	5.6
12021	FL	Collier County, Florida	316,931	4.9
12023	FL	Columbia County, Florida	66,964	5.4
12027	FL	DeSoto County, Florida	34,557	1.3
12029	FL	Dixie County, Florida	16,196	1.5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
12035	FL	Flagler County, Florida	91,806	3.6
12037	FL	Franklin County, Florida	11,470	2.7
12039	FL	Gadsden County, Florida	46,031	5.2
12041	FL	Gilchrist County, Florida	16,683	2.3
12043	FL	Glades County, Florida	12,617	2.9
12045	FL	Gulf County, Florida	15,879	4
12047	FL	Hamilton County, Florida	14,696	5.8
12049	FL	Hardee County, Florida	27,521	1.7
12051	FL	Hendry County, Florida	39,030	1.8
12053	FL	Hernando County, Florida	170,337	4.3
12055	FL	Highlands County, Florida	98,807	3.6
12059	FL	Holmes County, Florida	19,992	2.5
12063	FL	Jackson County, Florida	49,334	4.3
12065	FL	Jefferson County, Florida	14,583	3
12067	FL	Lafayette County, Florida	8,506	2.9
12069	FL	Lake County, Florida	291,671	4.8
12071	FL	Lee County, Florida	606,165	6
12075	FL	Levy County, Florida	40,415	3.6
12077	FL	Liberty County, Florida	8,230	0.6
12079	FL	Madison County, Florida	19,300	5.5
12081	FL	Manatee County, Florida	318,619	5.7
12083	FL	Marion County, Florida	326,833	4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
12085	FL	Martin County, Florida	144,322	4.6
12089	FL	Nassau County, Florida	71,099	3.8
12091	FL	Okaloosa County, Florida	182,076	5.4
12093	FL	Okeechobee County, Florida	39,883	5.5
12101	FL	Pasco County, Florida	456,514	5.8
12105	FL	Polk County, Florida	590,116	5.3
12107	FL	Putnam County, Florida	74,715	5.1
12109	FL	St. Johns County, Florida	180,624	5.8
12111	FL	St. Lucie County, Florida	269,659	5.8
12113	FL	Santa Rosa County, Florida	147,838	3.5
12115	FL	Sarasota County, Florida	376,200	6
12119	FL	Sumter County, Florida	85,891	1.4
12121	FL	Suwannee County, Florida	40,675	2.4
12123	FL	Taylor County, Florida	22,000	4.8
12125	FL	Union County, Florida	15,375	1.3
12129	FL	Wakulla County, Florida	29,368	2.5
12131	FL	Walton County, Florida	53,366	5.3
12133	FL	Washington County, Florida	24,125	2.9
13001	GA	Appling County, Georgia	18,050	6
13007	GA	Baker County, Georgia	3,657	2.6
13009	GA	Baldwin County, Georgia	46,905	5.8
13019	GA	Berrien County, Georgia	18,708	5.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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13023	GA	Bleckley County, Georgia	12,937	2.8
13025	GA	Brantley County, Georgia	17,650	1
13039	GA	Camden County, Georgia	49,293	6
13043	GA	Candler County, Georgia	10,715	5.5
13049	GA	Charlton County, Georgia	12,310	3.8
13053	GA	Chattahoochee County, Georgia	11,702	0
13055	GA	Chattooga County, Georgia	25,985	5.5
13057	GA	Cherokee County, Georgia	206,283	5.3
13061	GA	Clay County, Georgia	2,981	1.7
13065	GA	Clinch County, Georgia	6,841	5.2
13073	GA	Columbia County, Georgia	117,858	3.4
13075	GA	Cook County, Georgia	16,976	5.4
13079	GA	Crawford County, Georgia	12,821	3.2
13083	GA	Dade County, Georgia	16,595	4.9
13091	GA	Dodge County, Georgia	21,402	3.9
13101	GA	Echols County, Georgia	3,973	3.8
13105	GA	Elbert County, Georgia	20,421	4.1
13107	GA	Emanuel County, Georgia	22,348	3
13109	GA	Evans County, Georgia	10,966	2.7
13111	GA	Fannin County, Georgia	23,337	2.2
13113	GA	Fayette County, Georgia	105,344	5.1
13117	GA	Forsyth County, Georgia	163,885	4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
13123	GA	Gilmer County, Georgia	28,076	3.5
13133	GA	Greene County, Georgia	15,844	3.8
13141	GA	Hancock County, Georgia	9,649	1.6
13143	GA	Haralson County, Georgia	28,574	4.4
13145	GA	Harris County, Georgia	30,807	2
13147	GA	Hart County, Georgia	25,024	3.7
13151	GA	Henry County, Georgia	193,717	4
13159	GA	Jasper County, Georgia	13,695	3.4
13161	GA	Jeff Davis County, Georgia	14,558	6
13169	GA	Jones County, Georgia	28,292	3.3
13173	GA	Lanier County, Georgia	9,404	4.3
13179	GA	Liberty County, Georgia	63,854	5.3
13181	GA	Lincoln County, Georgia	8,111	0.9
13183	GA	Long County, Georgia	13,142	0.5
13187	GA	Lumpkin County, Georgia	28,875	2.8
13191	GA	McIntosh County, Georgia	13,817	4.7
13195	GA	Madison County, Georgia	27,798	4.1
13197	GA	Marion County, Georgia	8,403	4
13199	GA	Meriwether County, Georgia	22,425	3.7
13201	GA	Miller County, Georgia	6,128	4.1
13207	GA	Monroe County, Georgia	25,864	5.2
13209	GA	Montgomery County, Georgia	9,138	4.8

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
13211	GA	Morgan County, Georgia	17,741	4
13219	GA	Oconee County, Georgia	31,508	4.5
13221	GA	Oglethorpe County, Georgia	14,556	2.4
13227	GA	Pickens County, Georgia	29,155	5.2
13231	GA	Pike County, Georgia	17,411	3
13235	GA	Pulaski County, Georgia	11,632	1.6
13237	GA	Putnam County, Georgia	20,925	4.5
13239	GA	Quitman County, Georgia	2,528	3.4
13241	GA	Rabun County, Georgia	16,266	3.6
13253	GA	Seminole County, Georgia	8,797	2.2
13263	GA	Talbot County, Georgia	6,920	5.5
13267	GA	Tattnall County, Georgia	24,263	4.3
13271	GA	Telfair County, Georgia	16,052	2.9
13273	GA	Terrell County, Georgia	9,647	4.3
13281	GA	Towns County, Georgia	10,430	1.5
13283	GA	Treutlen County, Georgia	6,835	2.9
13289	GA	Twiggs County, Georgia	9,385	5.6
13291	GA	Union County, Georgia	21,083	4.1
13295	GA	Walker County, Georgia	67,845	4
13311	GA	White County, Georgia	26,498	5.1
13315	GA	Wilcox County, Georgia	9,041	2.6
13317	GA	Wilkes County, Georgia	10,580	2.9

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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13319	GA	Wilkinson County, Georgia	9,685	3.9
15005	HI	Kalawao County, Hawaii	74	0
16003	ID	Adams County, Idaho	3,942	3.2
16005	ID	Bannock County, Idaho	80,701	5.7
16007	ID	Bear Lake County, Idaho	6,026	1.5
16009	ID	Benewah County, Idaho	9,302	4.6
16011	ID	Bingham County, Idaho	44,496	3
16015	ID	Boise County, Idaho	7,122	3.8
16017	ID	Bonner County, Idaho	40,711	5
16019	ID	Bonneville County, Idaho	100,213	6
16021	ID	Boundary County, Idaho	10,792	4
16023	ID	Butte County, Idaho	2,842	1
16025	ID	Camas County, Idaho	1,216	0
16029	ID	Caribou County, Idaho	6,900	1.1
16031	ID	Cassia County, Idaho	22,109	5.8
16033	ID	Clark County, Idaho	857	2.2
16035	ID	Clearwater County, Idaho	8,766	3.1
16037	ID	Custer County, Idaho	4,277	2.2
16039	ID	Elmore County, Idaho	26,669	4.1
16041	ID	Franklin County, Idaho	12,497	1.1
16043	ID	Fremont County, Idaho	13,062	0.9
16045	ID	Gem County, Idaho	16,778	3.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
16047	ID	Gooding County, Idaho	15,140	3
16051	ID	Jefferson County, Idaho	24,523	1
16053	ID	Jerome County, Idaho	21,282	5.9
16057	ID	Latah County, Idaho	36,645	5.2
16059	ID	Lemhi County, Idaho	7,861	4.6
16063	ID	Lincoln County, Idaho	5,021	1.9
16065	ID	Madison County, Idaho	36,413	2.7
16067	ID	Minidoka County, Idaho	19,524	5.7
16071	ID	Oneida County, Idaho	4,212	4.3
16073	ID	Owyhee County, Idaho	11,389	5.2
16075	ID	Payette County, Idaho	22,451	1.4
16077	ID	Power County, Idaho	7,633	4
16085	ID	Valley County, Idaho	9,846	0.3
16087	ID	Washington County, Idaho	10,105	4.6
17005	IL	Bond County, Illinois	17,904	5.8
17007	IL	Boone County, Illinois	53,567	4.5
17009	IL	Brown County, Illinois	6,897	4.1
17015	IL	Carroll County, Illinois	15,615	4.9
17017	IL	Cass County, Illinois	13,648	4
17021	IL	Christian County, Illinois	34,936	5.5
17029	IL	Coles County, Illinois	53,568	5.2
17035	IL	Cumberland County, Illinois	11,073	1.7

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
17047	IL	Edwards County, Illinois	6,707	3.6
17049	IL	Effingham County, Illinois	34,232	5.7
17051	IL	Fayette County, Illinois	22,007	3.7
17053	IL	Ford County, Illinois	14,113	3.5
17055	IL	Franklin County, Illinois	39,528	5.7
17057	IL	Fulton County, Illinois	37,205	3.4
17059	IL	Gallatin County, Illinois	5,773	3.6
17061	IL	Greene County, Illinois	13,983	1.6
17065	IL	Hamilton County, Illinois	8,453	3.5
17067	IL	Hancock County, Illinois	19,227	3.5
17069	IL	Hardin County, Illinois	4,402	4.1
17071	IL	Henderson County, Illinois	7,462	3.5
17073	IL	Henry County, Illinois	50,477	5.3
17077	IL	Jackson County, Illinois	59,864	3.6
17079	IL	Jasper County, Illinois	9,752	5.5
17085	IL	Jo Daviess County, Illinois	22,728	4.6
17087	IL	Johnson County, Illinois	12,710	2.9
17093	IL	Kendall County, Illinois	105,602	4.2
17101	IL	Lawrence County, Illinois	16,849	5.4
17103	IL	Lee County, Illinois	36,100	3.8
17105	IL	Livingston County, Illinois	39,010	4.2
17111	IL	McHenry County, Illinois	306,050	5.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
17117	IL	Macoupin County, Illinois	47,980	5.3
17123	IL	Marshall County, Illinois	12,763	5.3
17125	IL	Mason County, Illinois	14,921	1.6
17127	IL	Massac County, Illinois	15,425	3.4
17129	IL	Menard County, Illinois	12,702	4.9
17131	IL	Mercer County, Illinois	16,551	3.8
17135	IL	Montgomery County, Illinois	30,230	6
17139	IL	Moultrie County, Illinois	14,723	4.1
17147	IL	Piatt County, Illinois	16,708	3.4
17149	IL	Pike County, Illinois	16,580	4.6
17155	IL	Putnam County, Illinois	5,982	4.1
17157	IL	Randolph County, Illinois	33,567	6
17159	IL	Richland County, Illinois	16,166	3.4
17169	IL	Schuyler County, Illinois	7,527	3.7
17171	IL	Scott County, Illinois	5,374	3.9
17173	IL	Shelby County, Illinois	22,362	4.2
17175	IL	Stark County, Illinois	6,086	1.4
17181	IL	Union County, Illinois	17,959	3.6
17189	IL	Washington County, Illinois	14,841	2.7
17191	IL	Wayne County, Illinois	16,846	3
17193	IL	White County, Illinois	14,800	5
17195	IL	Whiteside County, Illinois	58,750	6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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17197	IL	Will County, Illinois	667,977	5.1
17203	IL	Woodford County, Illinois	38,226	5.1
18007	IN	Benton County, Indiana	8,820	3.1
18009	IN	Blackford County, Indiana	12,960	5.5
18013	IN	Brown County, Indiana	15,271	3.6
18015	IN	Carroll County, Indiana	20,135	3.2
18017	IN	Cass County, Indiana	39,058	5
18021	IN	Clay County, Indiana	26,983	5.2
18025	IN	Crawford County, Indiana	10,825	4.2
18031	IN	Decatur County, Indiana	25,584	5.1
18033	IN	DeKalb County, Indiana	41,968	5.6
18037	IN	Dubois County, Indiana	41,809	5.3
18041	IN	Fayette County, Indiana	24,367	5.4
18049	IN	Fulton County, Indiana	20,684	3.9
18051	IN	Gibson County, Indiana	33,386	3.1
18055	IN	Greene County, Indiana	33,084	2.3
18057	IN	Hamilton County, Indiana	261,244	5.8
18061	IN	Harrison County, Indiana	38,616	3.8
18063	IN	Hendricks County, Indiana	140,028	5.1
18073	IN	Jasper County, Indiana	33,055	5.1
18075	IN	Jay County, Indiana	21,441	4.8
18085	IN	Kosciusko County, Indiana	76,982	5.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
18087	IN	LaGrange County, Indiana	36,996	3.3
18099	IN	Marshall County, Indiana	46,976	3.5
18101	IN	Martin County, Indiana	10,324	3.4
18107	IN	Montgomery County, Indiana	38,138	5.6
18109	IN	Morgan County, Indiana	68,654	5.6
18111	IN	Newton County, Indiana	14,300	6
18113	IN	Noble County, Indiana	47,513	4.8
18115	IN	Ohio County, Indiana	6,067	4.2
18119	IN	Owen County, Indiana	21,737	5.2
18121	IN	Parke County, Indiana	17,394	2.8
18123	IN	Perry County, Indiana	19,316	5.6
18125	IN	Pike County, Indiana	12,955	4.3
18129	IN	Posey County, Indiana	26,100	3.5
18131	IN	Pulaski County, Indiana	13,596	3.3
18133	IN	Putnam County, Indiana	38,048	4.1
18135	IN	Randolph County, Indiana	26,262	4.7
18137	IN	Ripley County, Indiana	28,570	4.4
18145	IN	Shelby County, Indiana	44,237	5.7
18147	IN	Spencer County, Indiana	20,977	3.6
18149	IN	Starke County, Indiana	23,343	4.3
18151	IN	Steuben County, Indiana	34,092	4.6
18155	IN	Switzerland County, Indiana	10,393	2.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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18159	IN	Tipton County, Indiana	16,132	4.1
18161	IN	Union County, Indiana	7,463	2.9
18165	IN	Vermillion County, Indiana	16,412	3.2
18169	IN	Wabash County, Indiana	33,225	6
18175	IN	Washington County, Indiana	28,226	5.1
18181	IN	White County, Indiana	24,734	4.2
19003	IA	Adams County, Iowa	4,127	3.5
19005	IA	Allamakee County, Iowa	14,331	4.6
19007	IA	Appanoose County, Iowa	13,029	5.8
19009	IA	Audubon County, Iowa	6,186	2.2
19011	IA	Benton County, Iowa	26,098	3.7
19017	IA	Bremer County, Iowa	24,185	4.9
19019	IA	Buchanan County, Iowa	21,026	4.3
19023	IA	Butler County, Iowa	14,892	4.6
19025	IA	Calhoun County, Iowa	9,846	4.1
19029	IA	Cass County, Iowa	13,969	5.6
19031	IA	Cedar County, Iowa	18,414	4.5
19037	IA	Chickasaw County, Iowa	12,499	4.2
19039	IA	Clarke County, Iowa	9,218	4.9
19051	IA	Davis County, Iowa	8,687	3.4
19055	IA	Delaware County, Iowa	17,857	4.7
19057	IA	Des Moines County, Iowa	40,266	5.5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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19059	IA	Dickinson County, Iowa	16,665	5.4
19065	IA	Fayette County, Iowa	20,992	5.7
19067	IA	Floyd County, Iowa	16,394	5.1
19069	IA	Franklin County, Iowa	10,697	5.9
19071	IA	Fremont County, Iowa	7,528	4
19075	IA	Grundy County, Iowa	12,401	4.1
19083	IA	Hardin County, Iowa	17,685	5.4
19089	IA	Howard County, Iowa	9,610	5
19093	IA	Ida County, Iowa	7,172	0.7
19095	IA	Iowa County, Iowa	16,353	3.5
19097	IA	Jackson County, Iowa	19,942	5.9
19105	IA	Jones County, Iowa	20,708	4.7
19113	IA	Linn County, Iowa	207,765	5.8
19115	IA	Louisa County, Iowa	11,683	2.5
19119	IA	Lyon County, Iowa	11,564	4.9
19121	IA	Madison County, Iowa	15,488	3.3
19129	IA	Mills County, Iowa	15,157	3.7
19133	IA	Monona County, Iowa	9,346	5.3
19135	IA	Monroe County, Iowa	7,918	2.2
19145	IA	Page County, Iowa	16,095	5.8
19147	IA	Palo Alto County, Iowa	9,508	4
19149	IA	Plymouth County, Iowa	24,933	4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
19151	IA	Pocahontas County, Iowa	7,509	3.2
19161	IA	Sac County, Iowa	10,480	5.3
19165	IA	Shelby County, Iowa	12,328	5.9
19167	IA	Sioux County, Iowa	33,377	3.9
19169	IA	Story County, Iowa	87,594	5.1
19171	IA	Tama County, Iowa	17,952	6
19173	IA	Taylor County, Iowa	6,402	5.1
19177	IA	Van Buren County, Iowa	7,645	4.7
19185	IA	Wayne County, Iowa	6,404	4.6
19187	IA	Webster County, Iowa	38,286	5.9
19195	IA	Worth County, Iowa	7,628	3.5
20001	KS	Allen County, Kansas	13,473	5
20003	KS	Anderson County, Kansas	8,084	4.4
20007	KS	Barber County, Kansas	4,900	2.8
20009	KS	Barton County, Kansas	27,499	5.1
20011	KS	Bourbon County, Kansas	15,097	5.8
20015	KS	Butler County, Kansas	64,853	3.7
20019	KS	Chautauqua County, Kansas	3,736	4
20021	KS	Cherokee County, Kansas	21,740	4
20025	KS	Clark County, Kansas	2,231	3.9
20027	KS	Clay County, Kansas	8,531	4.9
20029	KS	Cloud County, Kansas	9,538	2.5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
20031	KS	Coffey County, Kansas	8,587	3.9
20033	KS	Comanche County, Kansas	1,865	5.1
20037	KS	Crawford County, Kansas	38,985	5.3
20039	KS	Decatur County, Kansas	3,015	3.2
20043	KS	Doniphan County, Kansas	7,957	3.8
20047	KS	Edwards County, Kansas	3,052	0.8
20049	KS	Elk County, Kansas	2,930	3.2
20053	KS	Ellsworth County, Kansas	6,476	5.2
20063	KS	Gove County, Kansas	2,721	3.2
20067	KS	Grant County, Kansas	7,744	1.5
20069	KS	Gray County, Kansas	5,870	3.3
20071	KS	Greeley County, Kansas	1,294	0
20073	KS	Greenwood County, Kansas	6,824	4.3
20075	KS	Hamilton County, Kansas	2,643	4.8
20077	KS	Harper County, Kansas	6,033	4.6
20081	KS	Haskell County, Kansas	4,196	0
20085	KS	Jackson County, Kansas	13,360	3
20087	KS	Jefferson County, Kansas	19,059	4.3
20089	KS	Jewell County, Kansas	3,151	5
20093	KS	Kearny County, Kansas	3,966	4.1
20095	KS	Kingman County, Kansas	7,949	0.7
20097	KS	Kiowa County, Kansas	2,671	5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
20099	KS	Labette County, Kansas	21,791	4.8
20101	KS	Lane County, Kansas	1,725	3.6
20105	KS	Lincoln County, Kansas	3,308	3.9
20107	KS	Linn County, Kansas	9,782	2.9
20109	KS	Logan County, Kansas	2,774	4.6
20113	KS	McPherson County, Kansas	29,178	5.1
20115	KS	Marion County, Kansas	12,689	4.7
20117	KS	Marshall County, Kansas	10,147	2.9
20119	KS	Meade County, Kansas	4,523	2.7
20129	KS	Morton County, Kansas	3,244	0
20131	KS	Nemaha County, Kansas	10,253	5.6
20133	KS	Neosho County, Kansas	16,538	4
20135	KS	Ness County, Kansas	3,120	3
20139	KS	Osage County, Kansas	16,426	3
20141	KS	Osborne County, Kansas	3,906	4.7
20143	KS	Ottawa County, Kansas	6,107	3.9
20145	KS	Pawnee County, Kansas	6,913	5
20147	KS	Phillips County, Kansas	5,601	1.9
20153	KS	Rawlins County, Kansas	2,594	2.5
20157	KS	Republic County, Kansas	5,069	1.8
20163	KS	Rooks County, Kansas	5,241	5.1
20165	KS	Rush County, Kansas	3,290	1.7

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
20167	KS	Russell County, Kansas	6,915	2.9
20171	KS	Scott County, Kansas	4,832	1.4
20179	KS	Sheridan County, Kansas	2,578	4.4
20181	KS	Sherman County, Kansas	6,002	5.4
20183	KS	Smith County, Kansas	3,934	3
20185	KS	Stafford County, Kansas	4,433	1.6
20187	KS	Stanton County, Kansas	2,197	4.8
20197	KS	Wabaunsee County, Kansas	7,004	3.5
20199	KS	Wallace County, Kansas	1,440	1.7
20201	KS	Washington County, Kansas	5,851	3.4
20203	KS	Wichita County, Kansas	2,244	1.5
20205	KS	Wilson County, Kansas	9,598	2.8
20207	KS	Woodson County, Kansas	3,352	2.2
21001	KY	Adair County, Kentucky	18,542	3.2
21003	KY	Allen County, Kentucky	19,688	3.2
21011	KY	Bath County, Kentucky	11,565	2.4
21021	KY	Boyle County, Kentucky	28,245	6
21023	KY	Bracken County, Kentucky	8,479	4.3
21025	KY	Breathitt County, Kentucky	14,202	1.8
21027	KY	Breckinridge County, Kentucky	19,893	3
21029	KY	Bullitt County, Kentucky	72,515	4.8
21031	KY	Butler County, Kentucky	12,763	3.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
21035	KY	Calloway County, Kentucky	36,763	3.6
21039	KY	Carlisle County, Kentucky	5,126	1
21045	KY	Casey County, Kentucky	15,939	2.3
21053	KY	Clinton County, Kentucky	10,161	4.5
21055	KY	Crittenden County, Kentucky	9,313	4.8
21057	KY	Cumberland County, Kentucky	6,931	3
21061	KY	Edmonson County, Kentucky	12,086	4.3
21063	KY	Elliott County, Kentucky	7,493	1.7
21065	KY	Estill County, Kentucky	14,733	5.1
21069	KY	Fleming County, Kentucky	14,318	5.7
21071	KY	Floyd County, Kentucky	39,949	3
21075	KY	Fulton County, Kentucky	6,858	4.1
21081	KY	Grant County, Kentucky	24,604	5.1
21083	KY	Graves County, Kentucky	36,958	3.4
21085	KY	Grayson County, Kentucky	25,540	5.7
21089	KY	Greenup County, Kentucky	36,962	5.1
21091	KY	Hancock County, Kentucky	8,555	2.7
21093	KY	Hardin County, Kentucky	100,876	5.3
21099	KY	Hart County, Kentucky	18,201	4.6
21105	KY	Hickman County, Kentucky	4,949	1
21107	KY	Hopkins County, Kentucky	46,886	4.9
21109	KY	Jackson County, Kentucky	13,560	1.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
21119	KY	Knott County, Kentucky	16,587	3.1
21123	KY	Larue County, Kentucky	14,080	4.6
21125	KY	Laurel County, Kentucky	58,155	5.3
21127	KY	Lawrence County, Kentucky	15,841	3.8
21129	KY	Lee County, Kentucky	7,865	4.4
21133	KY	Letcher County, Kentucky	24,462	5.5
21135	KY	Lewis County, Kentucky	13,968	2.2
21139	KY	Livingston County, Kentucky	9,514	3.9
21143	KY	Lyon County, Kentucky	8,367	3.6
21147	KY	McCreary County, Kentucky	18,122	3.8
21149	KY	McLean County, Kentucky	9,635	4.7
21155	KY	Marion County, Kentucky	19,619	3.9
21157	KY	Marshall County, Kentucky	31,386	5.4
21159	KY	Martin County, Kentucky	13,138	5.2
21163	KY	Meade County, Kentucky	28,907	3
21167	KY	Mercer County, Kentucky	21,272	5.7
21169	KY	Metcalfe County, Kentucky	10,130	3.7
21175	KY	Morgan County, Kentucky	14,055	4.4
21177	KY	Muhlenberg County, Kentucky	31,541	4.6
21179	KY	Nelson County, Kentucky	42,523	3.6
21181	KY	Nicholas County, Kentucky	7,136	4.3
21183	KY	Ohio County, Kentucky	23,837	4.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
21185	KY	Oldham County, Kentucky	58,784	2.6
21187	KY	Owen County, Kentucky	10,928	3.3
21189	KY	Owsley County, Kentucky	4,742	3.5
21191	KY	Pendleton County, Kentucky	14,894	2.4
21193	KY	Perry County, Kentucky	28,739	4.4
21195	KY	Pike County, Kentucky	65,309	4.9
21201	KY	Robertson County, Kentucky	2,278	5.8
21203	KY	Rockcastle County, Kentucky	17,075	4.4
21207	KY	Russell County, Kentucky	17,445	3.5
21211	KY	Shelby County, Kentucky	40,899	5
21215	KY	Spencer County, Kentucky	16,582	3.1
21221	KY	Trigg County, Kentucky	14,117	5.5
21223	KY	Trimble County, Kentucky	8,872	1.5
21225	KY	Union County, Kentucky	15,077	5.7
21229	KY	Washington County, Kentucky	11,593	3.5
21233	KY	Webster County, Kentucky	13,734	3
21237	KY	Wolfe County, Kentucky	7,315	1.6
21239	KY	Woodford County, Kentucky	24,523	4.7
22003	LA	Allen Parish, Louisiana	25,816	5.4
22005	LA	Ascension Parish, Louisiana	102,501	4
22007	LA	Assumption Parish, Louisiana	23,487	3.9
22011	LA	Beauregard Parish, Louisiana	35,000	2.8

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
22021	LA	Caldwell Parish, Louisiana	10,188	5.3
22023	LA	Cameron Parish, Louisiana	7,280	0
22025	LA	Catahoula Parish, Louisiana	10,465	2.2
22027	LA	Claiborne Parish, Louisiana	17,160	1.6
22029	LA	Concordia Parish, Louisiana	20,502	3.4
22037	LA	East Feliciana Parish, Louisiana	20,417	2.3
22041	LA	Franklin Parish, Louisiana	20,727	3.5
22043	LA	Grant Parish, Louisiana	21,675	2
22047	LA	Iberville Parish, Louisiana	33,513	2.3
22049	LA	Jackson Parish, Louisiana	16,078	3.4
22057	LA	Lafourche Parish, Louisiana	95,428	3.2
22059	LA	La Salle Parish, Louisiana	14,680	4.9
22061	LA	Lincoln Parish, Louisiana	45,797	3.8
22063	LA	Livingston Parish, Louisiana	122,798	3.8
22067	LA	Morehouse Parish, Louisiana	28,388	5.3
22075	LA	Plaquemines Parish, Louisiana	22,710	2.2
22077	LA	Pointe Coupee Parish, Louisiana	22,837	3.8
22081	LA	Red River Parish, Louisiana	9,181	4.7
22083	LA	Richland Parish, Louisiana	20,692	3.4
22085	LA	Sabine Parish, Louisiana	24,119	2.9
22089	LA	St. Charles Parish, Louisiana	52,645	2.1
22091	LA	St. Helena Parish, Louisiana	11,125	0.9

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
22093	LA	St. James Parish, Louisiana	22,096	4.2
22095	LA	St. John the Baptist Parish, Louisiana	46,728	4.6
22099	LA	St. Martin Parish, Louisiana	51,721	4.6
22101	LA	St. Mary Parish, Louisiana	54,348	4.7
22105	LA	Tangipahoa Parish, Louisiana	118,190	5.7
22107	LA	Tensas Parish, Louisiana	5,430	3.4
22109	LA	Terrebonne Parish, Louisiana	111,131	4.2
22111	LA	Union Parish, Louisiana	22,750	1.5
22113	LA	Vermilion Parish, Louisiana	57,280	4.4
22115	LA	Vernon Parish, Louisiana	50,451	3.5
22121	LA	West Baton Rouge Parish, Louisiana	23,274	5
22123	LA	West Carroll Parish, Louisiana	11,689	5.6
22127	LA	Winn Parish, Louisiana	15,477	2.8
23007	ME	Franklin County, Maine	30,657	5
23009	ME	Hancock County, Maine	54,309	5.1
23015	ME	Lincoln County, Maine	34,719	3.3
23017	ME	Oxford County, Maine	57,867	4.9
23021	ME	Piscataquis County, Maine	17,555	5.3
23027	ME	Waldo County, Maine	38,740	3.7
23029	ME	Washington County, Maine	33,154	4.1
24001	MD	Allegany County, Maryland	74,638	5.9
24003	MD	Anne Arundel County, Maryland	527,020	6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
24035	MD	Queen Anne's County, Maryland	46,945	4.4
24037	MD	St. Mary's County, Maryland	102,086	5.1
24039	MD	Somerset County, Maryland	26,411	4.4
24047	MD	Worcester County, Maryland	51,133	5
25001	MA	Barnstable County, Massachusetts	217,483	4.3
25007	MA	Dukes County, Massachusetts	16,155	4.2
25011	MA	Franklin County, Massachusetts	71,523	4.2
26001	MI	Alcona County, Michigan	11,238	1.9
26005	MI	Allegan County, Michigan	111,385	3.6
26007	MI	Alpena County, Michigan	29,958	4.6
26009	MI	Antrim County, Michigan	23,975	1.9
26011	MI	Arenac County, Michigan	16,487	3
26015	MI	Barry County, Michigan	59,576	5.1
26019	MI	Benzie County, Michigan	17,705	4.3
26023	MI	Branch County, Michigan	46,083	5.4
26027	MI	Cass County, Michigan	52,429	2.8
26029	MI	Charlevoix County, Michigan	26,228	3.4
26031	MI	Cheboygan County, Michigan	26,699	2.6
26035	MI	Clare County, Michigan	31,162	5.1
26037	MI	Clinton County, Michigan	74,235	4.5
26039	MI	Crawford County, Michigan	14,325	2.5
26043	MI	Dickinson County, Michigan	26,584	5.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
26047	MI	Emmet County, Michigan	32,806	5.9
26051	MI	Gladwin County, Michigan	26,076	4.4
26053	MI	Gogebic County, Michigan	16,471	5.4
26055	MI	Grand Traverse County, Michigan	86,061	5.7
26057	MI	Gratiot County, Michigan	42,612	4.1
26059	MI	Hillsdale County, Michigan	47,033	3.2
26061	MI	Houghton County, Michigan	36,192	4.1
26063	MI	Huron County, Michigan	33,642	4.1
26069	MI	Iosco County, Michigan	26,422	2.6
26071	MI	Iron County, Michigan	12,057	5.1
26079	MI	Kalkaska County, Michigan	17,400	2.6
26083	MI	Keweenaw County, Michigan	2,122	2.1
26085	MI	Lake County, Michigan	11,625	2.9
26087	MI	Lapeer County, Michigan	89,944	5.5
26089	MI	Leelanau County, Michigan	21,757	1.3
26093	MI	Livingston County, Michigan	181,350	5.6
26095	MI	Luce County, Michigan	6,685	4.8
26097	MI	Mackinac County, Michigan	11,281	3.1
26101	MI	Manistee County, Michigan	24,951	4.8
26105	MI	Mason County, Michigan	28,715	5.3
26107	MI	Mecosta County, Michigan	42,730	3.7
26109	MI	Menominee County, Michigan	24,245	5.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
26113	MI	Missaukee County, Michigan	14,962	2.6
26119	MI	Montmorency County, Michigan	9,920	0.4
26123	MI	Newaygo County, Michigan	48,962	2.9
26127	MI	Oceana County, Michigan	27,029	2.8
26129	MI	Ogemaw County, Michigan	21,862	3.8
26131	MI	Ontonagon County, Michigan	6,976	3.9
26133	MI	Osceola County, Michigan	23,681	3.8
26135	MI	Oscoda County, Michigan	8,884	4.1
26137	MI	Otsego County, Michigan	24,445	2.6
26141	MI	Presque Isle County, Michigan	13,697	1.3
26143	MI	Roscommon County, Michigan	24,932	2.7
26151	MI	Sanilac County, Michigan	44,010	4.1
26153	MI	Schoolcraft County, Michigan	8,640	3.7
26157	MI	Tuscola County, Michigan	56,543	2.4
26165	MI	Wexford County, Michigan	32,653	4.6
27001	MN	Aitkin County, Minnesota	16,325	4.6
27007	MN	Beltrami County, Minnesota	43,781	6
27021	MN	Cass County, Minnesota	28,648	2.3
27031	MN	Cook County, Minnesota	5,211	1.8
27039	MN	Dodge County, Minnesota	19,829	6
27055	MN	Houston County, Minnesota	19,226	4.5
27057	MN	Hubbard County, Minnesota	20,205	5.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
27063	MN	Jackson County, Minnesota	10,403	4.6
27069	MN	Kittson County, Minnesota	4,620	5
27073	MN	Lac qui Parle County, Minnesota	7,343	5.3
27075	MN	Lake County, Minnesota	10,900	3.2
27077	MN	Lake of the Woods County, Minnesota	4,147	4.4
27079	MN	Le Sueur County, Minnesota	27,719	4.8
27081	MN	Lincoln County, Minnesota	5,935	5.5
27087	MN	Mahnomen County, Minnesota	5,359	6
27101	MN	Murray County, Minnesota	8,779	4.5
27105	MN	Nobles County, Minnesota	21,030	5.7
27115	MN	Pine County, Minnesota	29,413	5
27125	MN	Red Lake County, Minnesota	4,094	3.6
27143	MN	Sibley County, Minnesota	15,219	5.3
27153	MN	Todd County, Minnesota	24,804	5
27155	MN	Traverse County, Minnesota	3,657	3.4
27165	MN	Watonwan County, Minnesota	11,212	5.4
27173	MN	Yellow Medicine County, Minnesota	10,514	4.1
28003	MS	Alcorn County, Mississippi	36,708	5.3
28005	MS	Amite County, Mississippi	13,318	1.7
28007	MS	Attala County, Mississippi	19,545	4.7
28009	MS	Benton County, Mississippi	8,652	1.1
28015	MS	Carroll County, Mississippi	10,608	2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
28019	MS	Choctaw County, Mississippi	8,680	1.3
28021	MS	Claiborne County, Mississippi	9,928	5.7
28023	MS	Clarke County, Mississippi	16,808	3.1
28025	MS	Clay County, Mississippi	20,883	4.5
28029	MS	Copiah County, Mississippi	29,521	4.4
28031	MS	Covington County, Mississippi	19,557	1.1
28033	MS	DeSoto County, Mississippi	154,715	5
28039	MS	George County, Mississippi	22,061	2.9
28041	MS	Greene County, Mississippi	14,009	2
28045	MS	Hancock County, Mississippi	42,408	3.3
28051	MS	Holmes County, Mississippi	19,597	2.3
28055	MS	Issaquena County, Mississippi	1,893	4.7
28059	MS	Jackson County, Mississippi	137,082	5
28061	MS	Jasper County, Mississippi	17,383	3.9
28063	MS	Jefferson County, Mississippi	7,970	1.3
28065	MS	Jefferson Davis County, Mississippi	12,666	2.1
28067	MS	Jones County, Mississippi	67,144	6
28069	MS	Kemper County, Mississippi	10,470	5.1
28071	MS	Lafayette County, Mississippi	45,859	3
28073	MS	Lamar County, Mississippi	52,559	5.7
28077	MS	Lawrence County, Mississippi	13,016	1.8
28079	MS	Leake County, Mississippi	23,547	1.9

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
28093	MS	Marshall County, Mississippi	37,002	5.5
28095	MS	Monroe County, Mississippi	37,282	6
28097	MS	Montgomery County, Mississippi	11,138	4.5
28101	MS	Newton County, Mississippi	21,828	2.4
28107	MS	Panola County, Mississippi	34,782	3.3
28109	MS	Pearl River County, Mississippi	55,923	3.2
28111	MS	Perry County, Mississippi	12,243	0.3
28115	MS	Pontotoc County, Mississippi	29,523	4
28117	MS	Prentiss County, Mississippi	25,411	5.6
28121	MS	Rankin County, Mississippi	138,523	4.5
28123	MS	Scott County, Mississippi	28,180	2.6
28125	MS	Sharkey County, Mississippi	4,797	4.6
28127	MS	Simpson County, Mississippi	27,575	2.7
28129	MS	Smith County, Mississippi	16,443	1.3
28131	MS	Stone County, Mississippi	16,923	1.8
28135	MS	Tallahatchie County, Mississippi	15,270	2.2
28139	MS	Tippah County, Mississippi	21,993	4.8
28141	MS	Tishomingo County, Mississippi	19,535	2.7
28143	MS	Tunica County, Mississippi	10,817	4
28147	MS	Walthall County, Mississippi	15,530	2.2
28153	MS	Wayne County, Mississippi	20,971	2.4
28157	MS	Wilkinson County, Mississippi	10,070	5.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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28159	MS	Winston County, Mississippi	19,378	2.5
28161	MS	Yalobusha County, Mississippi	12,869	3.8
29005	MO	Atchison County, Missouri	5,811	3.6
29009	MO	Barry County, Missouri	35,753	3.5
29011	MO	Barton County, Missouri	12,634	4.3
29013	MO	Bates County, Missouri	17,132	5.5
29015	MO	Benton County, Missouri	18,975	2.9
29017	MO	Bollinger County, Missouri	12,445	3.9
29027	MO	Callaway County, Missouri	43,769	3.3
29029	MO	Camden County, Missouri	43,157	2.1
29033	MO	Carroll County, Missouri	9,485	5.4
29035	MO	Carter County, Missouri	6,141	2.2
29039	MO	Cedar County, Missouri	14,091	3.7
29041	MO	Chariton County, Missouri	7,871	3.3
29043	MO	Christian County, Missouri	74,156	6
29045	MO	Clark County, Missouri	7,169	4.5
29049	MO	Clinton County, Missouri	20,682	2.8
29051	MO	Cole County, Missouri	74,767	5.5
29053	MO	Cooper County, Missouri	17,583	4.1
29055	MO	Crawford County, Missouri	24,640	3.2
29057	MO	Dade County, Missouri	7,929	3
29059	MO	Dallas County, Missouri	16,813	4.7

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
29067	MO	Douglas County, Missouri	13,689	4.5
29071	MO	Franklin County, Missouri	100,737	5.5
29073	MO	Gasconade County, Missouri	15,334	4.5
29081	MO	Harrison County, Missouri	8,941	4.7
29085	MO	Hickory County, Missouri	9,579	2.2
29087	MO	Holt County, Missouri	4,944	2.5
29089	MO	Howard County, Missouri	10,120	6
29093	MO	Iron County, Missouri	10,670	5.6
29099	MO	Jefferson County, Missouri	216,262	4.7
29101	MO	Johnson County, Missouri	52,041	5.5
29103	MO	Knox County, Missouri	4,134	3
29105	MO	Laclede County, Missouri	35,357	4
29107	MO	Lafayette County, Missouri	33,313	5
29111	MO	Lewis County, Missouri	10,235	4.8
29113	MO	Lincoln County, Missouri	51,333	3.8
29119	MO	McDonald County, Missouri	23,016	4.5
29121	MO	Macon County, Missouri	15,539	5.6
29125	MO	Maries County, Missouri	9,203	3.9
29135	MO	Moniteau County, Missouri	15,468	4.5
29137	MO	Monroe County, Missouri	9,078	4.6
29139	MO	Montgomery County, Missouri	12,247	1.1
29141	MO	Morgan County, Missouri	20,631	1.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
29149	MO	Oregon County, Missouri	10,739	3.4
29151	MO	Osage County, Missouri	13,768	2.4
29153	MO	Ozark County, Missouri	9,688	3.5
29157	MO	Perry County, Missouri	18,919	5.9
29173	MO	Ralls County, Missouri	10,127	3.4
29175	MO	Randolph County, Missouri	25,495	5.9
29177	MO	Ray County, Missouri	23,667	5.9
29179	MO	Reynolds County, Missouri	6,698	1.8
29181	MO	Ripley County, Missouri	14,057	4.8
29185	MO	St. Clair County, Missouri	9,757	5.5
29199	MO	Scotland County, Missouri	4,831	0.6
29203	MO	Shannon County, Missouri	8,404	4.5
29205	MO	Shelby County, Missouri	6,439	4.2
29209	MO	Stone County, Missouri	32,003	5.1
29213	MO	Taney County, Missouri	49,324	3.7
29215	MO	Texas County, Missouri	25,662	3
29219	MO	Warren County, Missouri	31,635	5.9
29221	MO	Washington County, Missouri	24,981	4
29223	MO	Wayne County, Missouri	13,433	5.3
29227	MO	Worth County, Missouri	2,188	1.3
29229	MO	Wright County, Missouri	18,731	5.1
30001	MT	Beaverhead County, Montana	9,132	2.2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
30003	MT	Big Horn County, Montana	12,663	2.4
30005	MT	Blaine County, Montana	6,472	4.3
30007	MT	Broadwater County, Montana	5,287	3.5
30009	MT	Carbon County, Montana	9,994	2
30011	MT	Carter County, Montana	1,289	3
30015	MT	Chouteau County, Montana	5,765	5.2
30017	MT	Custer County, Montana	11,548	5.3
30021	MT	Dawson County, Montana	8,933	3.4
30025	MT	Fallon County, Montana	2,813	4.1
30027	MT	Fergus County, Montana	11,513	4.4
30031	MT	Gallatin County, Montana	87,676	4.7
30033	MT	Garfield County, Montana	1,224	0
30039	MT	Granite County, Montana	3,044	5.4
30043	MT	Jefferson County, Montana	11,166	1.4
30045	MT	Judith Basin County, Montana	1,967	3.9
30047	MT	Lake County, Montana	28,493	6
30053	MT	Lincoln County, Montana	19,507	5.7
30057	MT	Madison County, Montana	7,588	2
30059	MT	Meagher County, Montana	2,024	5.1
30065	MT	Musselshell County, Montana	4,339	2.6
30071	MT	Phillips County, Montana	4,206	2.1
30075	MT	Powder River County, Montana	1,659	5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
30079	MT	Prairie County, Montana	1,089	5.7
30081	MT	Ravalli County, Montana	40,013	4.2
30087	MT	Rosebud County, Montana	9,134	3.9
30089	MT	Sanders County, Montana	11,366	3.3
30095	MT	Stillwater County, Montana	8,934	1.7
30097	MT	Sweet Grass County, Montana	3,717	2.4
30101	MT	Toole County, Montana	5,143	5.4
30103	MT	Treasure County, Montana	848	2.8
30107	MT	Wheatland County, Montana	2,118	2.1
31003	NE	Antelope County, Nebraska	6,742	3.1
31005	NE	Arthur County, Nebraska	426	0
31007	NE	Banner County, Nebraska	720	0
31009	NE	Blaine County, Nebraska	539	0
31011	NE	Boone County, Nebraska	5,553	2.4
31015	NE	Boyd County, Nebraska	2,107	1.9
31023	NE	Butler County, Nebraska	8,382	4.7
31025	NE	Cass County, Nebraska	25,246	3.2
31027	NE	Cedar County, Nebraska	8,906	4.1
31033	NE	Cheyenne County, Nebraska	10,049	5.9
31037	NE	Colfax County, Nebraska	10,201	4
31039	NE	Cuming County, Nebraska	9,243	4.3
31041	NE	Custer County, Nebraska	11,001	4.8

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
31049	NE	Deuel County, Nebraska	1,963	3.5
31051	NE	Dixon County, Nebraska	6,000	3.9
31057	NE	Dundy County, Nebraska	1,963	0
31061	NE	Franklin County, Nebraska	3,229	2.5
31063	NE	Frontier County, Nebraska	2,808	1.8
31065	NE	Furnas County, Nebraska	4,942	4.6
31069	NE	Garden County, Nebraska	2,060	0
31071	NE	Garfield County, Nebraska	2,081	2.4
31073	NE	Gosper County, Nebraska	2,058	0
31075	NE	Grant County, Nebraska	661	0
31077	NE	Greeley County, Nebraska	2,542	1.9
31083	NE	Harlan County, Nebraska	3,460	4
31085	NE	Hayes County, Nebraska	1,025	4.5
31087	NE	Hitchcock County, Nebraska	2,925	1.4
31091	NE	Hooker County, Nebraska	690	2.9
31101	NE	Keith County, Nebraska	8,356	3.2
31103	NE	Keya Paha County, Nebraska	740	2
31107	NE	Knox County, Nebraska	8,762	5
31113	NE	Logan County, Nebraska	682	0
31115	NE	Loup County, Nebraska	635	0
31123	NE	Morrill County, Nebraska	5,071	3
31127	NE	Nemaha County, Nebraska	7,249	5.7

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
31129	NE	Nuckolls County, Nebraska	4,583	1.5
31133	NE	Pawnee County, Nebraska	2,767	3.6
31139	NE	Pierce County, Nebraska	7,308	4.4
31143	NE	Polk County, Nebraska	5,412	1.9
31149	NE	Rock County, Nebraska	1,651	1.6
31151	NE	Saline County, Nebraska	14,098	5.4
31155	NE	Saunders County, Nebraska	20,543	3.3
31161	NE	Sheridan County, Nebraska	5,538	5.4
31163	NE	Sherman County, Nebraska	3,144	1.7
31165	NE	Sioux County, Nebraska	1,340	0
31167	NE	Stanton County, Nebraska	6,207	2.7
31169	NE	Thayer County, Nebraska	5,262	4.2
31171	NE	Thomas County, Nebraska	756	0
31177	NE	Washington County, Nebraska	20,148	5.8
31179	NE	Wayne County, Nebraska	9,573	4.5
31181	NE	Webster County, Nebraska	3,815	4
31183	NE	Wheeler County, Nebraska	751	0
31185	NE	York County, Nebraska	13,886	4.8
32005	NV	Douglas County, Nevada	47,042	4.2
32011	NV	Eureka County, Nevada	1,724	0
32013	NV	Humboldt County, Nevada	15,986	3.8
32015	NV	Lander County, Nevada	5,545	2.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
32021	NV	Mineral County, Nevada	4,812	4.4
32027	NV	Pershing County, Nevada	6,703	0.6
32029	NV	Storey County, Nevada	4,016	1.5
32033	NV	White Pine County, Nevada	9,765	1.9
33003	NH	Carroll County, New Hampshire	47,772	5.1
33019	NH	Sullivan County, New Hampshire	43,643	5.6
34029	NJ	Ocean County, New Jersey	569,374	4.4
35003	NM	Catron County, New Mexico	3,652	0.4
35006	NM	Cibola County, New Mexico	27,179	3.8
35007	NM	Colfax County, New Mexico	13,827	5.8
35009	NM	Curry County, New Mexico	46,924	4.1
35011	NM	De Baca County, New Mexico	1,772	3.8
35015	NM	Eddy County, New Mexico	52,665	3.5
35017	NM	Grant County, New Mexico	29,706	3.1
35019	NM	Guadalupe County, New Mexico	4,698	5.7
35021	NM	Harding County, New Mexico	943	5.3
35023	NM	Hidalgo County, New Mexico	4,964	3.1
35025	NM	Lea County, New Mexico	62,503	4.7
35027	NM	Lincoln County, New Mexico	20,502	1.6
35028	NM	Los Alamos County, New Mexico	18,091	1.2
35029	NM	Luna County, New Mexico	25,252	4.9
35031	NM	McKinley County, New Mexico	70,663	4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
35033	NM	Mora County, New Mexico	4,923	2.5
35035	NM	Otero County, New Mexico	62,782	4.5
35037	NM	Quay County, New Mexico	9,002	3.6
35039	NM	Rio Arriba County, New Mexico	40,195	1.9
35045	NM	San Juan County, New Mexico	127,517	4.6
35047	NM	San Miguel County, New Mexico	29,321	5.4
35051	NM	Sierra County, New Mexico	11,938	5.2
35053	NM	Socorro County, New Mexico	17,964	1.9
35055	NM	Taos County, New Mexico	32,574	3.9
35059	NM	Union County, New Mexico	4,388	1.4
35061	NM	Valencia County, New Mexico	74,554	4.4
36003	NY	Allegany County, New York	49,105	5.2
36025	NY	Delaware County, New York	48,220	5.2
36041	NY	Hamilton County, New York	4,908	3.2
36097	NY	Schuyler County, New York	18,566	5.8
36107	NY	Tioga County, New York	51,377	4.4
36123	NY	Yates County, New York	25,250	5.4
37003	NC	Alexander County, North Carolina	36,797	3.6
37005	NC	Alleghany County, North Carolina	11,084	3.4
37009	NC	Ashe County, North Carolina	26,787	3.7
37011	NC	Avery County, North Carolina	17,951	3.9
37015	NC	Bertie County, North Carolina	20,890	4.9

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
37017	NC	Bladen County, North Carolina	34,629	5.5
37019	NC	Brunswick County, North Carolina	101,994	3.6
37021	NC	Buncombe County, North Carolina	233,249	5.9
37023	NC	Burke County, North Carolina	90,557	5.9
37027	NC	Caldwell County, North Carolina	82,162	4.9
37029	NC	Camden County, North Carolina	9,719	1.9
37031	NC	Carteret County, North Carolina	65,068	5
37033	NC	Caswell County, North Carolina	23,848	3.2
37037	NC	Chatham County, North Carolina	61,426	4.9
37039	NC	Cherokee County, North Carolina	27,317	2.1
37043	NC	Clay County, North Carolina	10,418	0.7
37053	NC	Currituck County, North Carolina	23,299	2.8
37055	NC	Dare County, North Carolina	33,650	4.1
37059	NC	Davie County, North Carolina	40,581	3.1
37073	NC	Gates County, North Carolina	12,039	3
37075	NC	Graham County, North Carolina	8,702	5.4
37087	NC	Haywood County, North Carolina	58,597	3.3
37089	NC	Henderson County, North Carolina	103,881	4.4
37091	NC	Hertford County, North Carolina	24,384	5.9
37095	NC	Hyde County, North Carolina	5,721	0
37097	NC	Iredell County, North Carolina	154,632	6
37099	NC	Jackson County, North Carolina	39,144	4.9

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
37103	NC	Jones County, North Carolina	10,060	4
37109	NC	Lincoln County, North Carolina	75,697	4.5
37111	NC	McDowell County, North Carolina	44,593	4.5
37113	NC	Macon County, North Carolina	33,453	2.2
37121	NC	Mitchell County, North Carolina	15,680	4.4
37123	NC	Montgomery County, North Carolina	27,611	4.3
37131	NC	Northampton County, North Carolina	22,161	4
37133	NC	Onslow County, North Carolina	169,207	6
37137	NC	Pamlico County, North Carolina	13,072	2.6
37141	NC	Pender County, North Carolina	50,256	4.7
37143	NC	Perquimans County, North Carolina	13,091	4.5
37151	NC	Randolph County, North Carolina	140,034	4.9
37159	NC	Rowan County, North Carolina	136,880	5.9
37169	NC	Stokes County, North Carolina	47,194	5.1
37175	NC	Transylvania County, North Carolina	32,404	4.1
37177	NC	Tyrrell County, North Carolina	4,374	0
37179	NC	Union County, North Carolina	190,346	4.5
37189	NC	Watauga County, North Carolina	49,705	4.4
37193	NC	Wilkes County, North Carolina	69,063	3.9
37197	NC	Yadkin County, North Carolina	38,158	5.5
37199	NC	Yancey County, North Carolina	17,911	3.9
38007	ND	Billings County, North Dakota	897	0

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
38011	ND	Bowman County, North Dakota	3,102	4.4
38013	ND	Burke County, North Dakota	1,948	1.8
38019	ND	Cavalier County, North Dakota	4,046	5.8
38023	ND	Divide County, North Dakota	2,050	1.9
38025	ND	Dunn County, North Dakota	3,477	0.8
38027	ND	Eddy County, North Dakota	2,455	4.1
38029	ND	Emmons County, North Dakota	3,617	3.9
38033	ND	Golden Valley County, North Dakota	1,539	4.3
38037	ND	Grant County, North Dakota	2,486	3.4
38039	ND	Griggs County, North Dakota	2,426	5.5
38041	ND	Hettinger County, North Dakota	2,506	2.7
38045	ND	LaMoure County, North Dakota	4,233	5.2
38047	ND	Logan County, North Dakota	2,001	4.5
38049	ND	McHenry County, North Dakota	5,400	5
38051	ND	McIntosh County, North Dakota	2,917	3.7
38053	ND	McKenzie County, North Dakota	6,004	2.4
38055	ND	McLean County, North Dakota	8,861	3.5
38057	ND	Mercer County, North Dakota	8,353	4
38061	ND	Mountrail County, North Dakota	7,228	2.9
38063	ND	Nelson County, North Dakota	3,185	5.2
38065	ND	Oliver County, North Dakota	1,808	1.4
38075	ND	Renville County, North Dakota	2,442	2.7

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
38079	ND	Rolette County, North Dakota	13,766	5.7
38085	ND	Sioux County, North Dakota	4,121	4.4
38087	ND	Slope County, North Dakota	727	4
38091	ND	Steele County, North Dakota	1,977	1.2
38103	ND	Wells County, North Dakota	4,276	5.9
39009	OH	Athens County, Ohio	64,455	5
39019	OH	Carroll County, Ohio	28,988	4.5
39021	OH	Champaign County, Ohio	40,140	5.5
39033	OH	Crawford County, Ohio	44,294	5.8
39037	OH	Darke County, Ohio	52,945	5.8
39041	OH	Delaware County, Ohio	166,108	5.2
39051	OH	Fulton County, Ohio	42,756	4.6
39055	OH	Geauga County, Ohio	93,604	3.8
39065	OH	Hardin County, Ohio	32,104	5
39069	OH	Henry County, Ohio	28,546	3.7
39075	OH	Holmes County, Ohio	42,068	2.7
39077	OH	Huron County, Ohio	59,932	5.9
39105	OH	Meigs County, Ohio	23,649	4.6
39111	OH	Monroe County, Ohio	14,751	1.1
39115	OH	Morgan County, Ohio	15,113	3.8
39117	OH	Morrow County, Ohio	34,815	5.3
39123	OH	Ottawa County, Ohio	41,553	5.2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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39133	OH	Portage County, Ohio	159,943	5.6
39135	OH	Preble County, Ohio	42,502	4.3
39137	OH	Putnam County, Ohio	34,647	3.6
39141	OH	Ross County, Ohio	77,537	5.6
39159	OH	Union County, Ohio	50,708	5.2
39161	OH	Van Wert County, Ohio	29,029	2.5
39163	OH	Vinton County, Ohio	13,485	4.8
39165	OH	Warren County, Ohio	207,790	5.6
39171	OH	Williams County, Ohio	38,172	5.1
40001	OK	Adair County, Oklahoma	22,424	5.9
40003	OK	Alfalfa County, Oklahoma	5,621	2.4
40005	OK	Atoka County, Oklahoma	14,140	4.3
40007	OK	Beaver County, Oklahoma	5,564	1.3
40009	OK	Beckham County, Oklahoma	21,817	5.5
40011	OK	Blaine County, Oklahoma	11,972	5.5
40015	OK	Caddo County, Oklahoma	28,951	5.8
40019	OK	Carter County, Oklahoma	46,993	6
40023	OK	Choctaw County, Oklahoma	15,190	5.5
40025	OK	Cimarron County, Oklahoma	2,503	2.2
40033	OK	Cotton County, Oklahoma	6,230	5.1
40035	OK	Craig County, Oklahoma	14,951	3.8
40037	OK	Creek County, Oklahoma	68,914	4.8

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
40041	OK	Delaware County, Oklahoma	41,017	2.6
40043	OK	Dewey County, Oklahoma	4,720	3.1
40045	OK	Ellis County, Oklahoma	4,041	1.3
40049	OK	Garvin County, Oklahoma	27,462	5.3
40051	OK	Grady County, Oklahoma	51,545	5.4
40053	OK	Grant County, Oklahoma	4,579	3.5
40055	OK	Greer County, Oklahoma	6,182	5.5
40057	OK	Harmon County, Oklahoma	2,875	2
40059	OK	Harper County, Oklahoma	3,607	0.7
40061	OK	Haskell County, Oklahoma	12,577	4.6
40063	OK	Hughes County, Oklahoma	13,606	3.9
40065	OK	Jackson County, Oklahoma	26,386	5.9
40067	OK	Jefferson County, Oklahoma	6,435	3.7
40069	OK	Johnston County, Oklahoma	10,816	1.1
40071	OK	Kay County, Oklahoma	46,473	4.8
40073	OK	Kingfisher County, Oklahoma	14,776	4.1
40079	OK	Le Flore County, Oklahoma	49,822	4.7
40081	OK	Lincoln County, Oklahoma	33,823	4.2
40083	OK	Logan County, Oklahoma	39,777	3.7
40085	OK	Love County, Oklahoma	9,306	3.1
40087	OK	McClain County, Oklahoma	33,107	3.5
40089	OK	McCurtain County, Oklahoma	33,130	4.9

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
40091	OK	McIntosh County, Oklahoma	20,012	3.8
40093	OK	Major County, Oklahoma	7,487	0.4
40095	OK	Marshall County, Oklahoma	15,465	5.3
40097	OK	Mayes County, Oklahoma	40,807	4.1
40099	OK	Murray County, Oklahoma	13,193	1.2
40105	OK	Nowata County, Oklahoma	10,674	0
40107	OK	Okfuskee County, Oklahoma	12,036	4.2
40111	OK	Okmulgee County, Oklahoma	39,664	5.2
40113	OK	Osage County, Oklahoma	47,192	4.6
40115	OK	Ottawa County, Oklahoma	32,193	4.3
40117	OK	Pawnee County, Oklahoma	16,564	5.9
40127	OK	Pushmataha County, Oklahoma	11,500	2
40129	OK	Roger Mills County, Oklahoma	3,530	0.8
40131	OK	Rogers County, Oklahoma	85,044	6
40135	OK	Sequoyah County, Oklahoma	41,855	4.8
40137	OK	Stephens County, Oklahoma	44,454	3.6
40139	OK	Texas County, Oklahoma	19,826	3.8
40141	OK	Tillman County, Oklahoma	8,154	4.5
40145	OK	Wagoner County, Oklahoma	70,232	4.4
40147	OK	Washington County, Oklahoma	50,339	5
40149	OK	Washita County, Oklahoma	11,571	4.8
40151	OK	Woods County, Oklahoma	8,656	4.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
40153	OK	Woodward County, Oklahoma	19,967	3
41013	OR	Crook County, Oregon	21,515	4
41023	OR	Grant County, Oregon	7,349	4.8
41031	OR	Jefferson County, Oregon	21,652	3.8
41037	OR	Lake County, Oregon	7,882	1.9
41055	OR	Sherman County, Oregon	1,819	3.5
41063	OR	Wallowa County, Oregon	6,919	4
41069	OR	Wheeler County, Oregon	1,443	6
42005	PA	Armstrong County, Pennsylvania	69,489	5.6
42009	PA	Bedford County, Pennsylvania	49,882	4.2
42015	PA	Bradford County, Pennsylvania	62,415	5.2
42023	PA	Cameron County, Pennsylvania	5,197	4.3
42031	PA	Clarion County, Pennsylvania	40,290	4.7
42033	PA	Clearfield County, Pennsylvania	82,131	6
42035	PA	Clinton County, Pennsylvania	38,970	6
42053	PA	Forest County, Pennsylvania	7,585	2.6
42057	PA	Fulton County, Pennsylvania	14,839	5.1
42061	PA	Huntingdon County, Pennsylvania	45,830	4.9
42067	PA	Juniata County, Pennsylvania	24,385	3.6
42089	PA	Monroe County, Pennsylvania	168,080	5.1
42093	PA	Montour County, Pennsylvania	18,152	5.8
42099	PA	Perry County, Pennsylvania	45,599	3.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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42103	PA	Pike County, Pennsylvania	56,993	5
42109	PA	Snyder County, Pennsylvania	39,400	5.6
42113	PA	Sullivan County, Pennsylvania	6,467	2.9
42115	PA	Susquehanna County, Pennsylvania	43,343	4
42117	PA	Tioga County, Pennsylvania	41,631	5.1
42123	PA	Warren County, Pennsylvania	41,877	5.8
42127	PA	Wayne County, Pennsylvania	52,302	4.4
42131	PA	Wyoming County, Pennsylvania	28,262	5.2
45001	SC	Abbeville County, South Carolina	25,643	5.6
45003	SC	Aiken County, South Carolina	156,670	5.5
45005	SC	Allendale County, South Carolina	10,688	3.9
45011	SC	Barnwell County, South Carolina	22,748	3.8
45013	SC	Beaufort County, South Carolina	155,550	4.3
45015	SC	Berkeley County, South Carolina	169,878	5.4
45017	SC	Calhoun County, South Carolina	15,212	0.2
45023	SC	Chester County, South Carolina	33,246	5.8
45029	SC	Colleton County, South Carolina	38,833	3.7
45033	SC	Dillon County, South Carolina	31,666	5.7
45035	SC	Dorchester County, South Carolina	129,618	4.8
45037	SC	Edgefield County, South Carolina	26,680	4.4
45039	SC	Fairfield County, South Carolina	24,040	4.1
45049	SC	Hampton County, South Carolina	21,173	3.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
45051	SC	Horry County, South Carolina	258,267	4.6
45053	SC	Jasper County, South Carolina	23,634	5.9
45055	SC	Kershaw County, South Carolina	60,166	2.1
45057	SC	Lancaster County, South Carolina	72,302	4.7
45061	SC	Lee County, South Carolina	19,615	4.7
45063	SC	Lexington County, South Carolina	252,563	4.6
45065	SC	McCormick County, South Carolina	10,203	5.4
45069	SC	Marlboro County, South Carolina	29,112	4.8
45071	SC	Newberry County, South Carolina	37,197	5.6
45073	SC	Oconee County, South Carolina	73,035	3.7
45077	SC	Pickens County, South Carolina	117,823	5.7
45081	SC	Saluda County, South Carolina	19,567	2.3
45089	SC	Williamsburg County, South Carolina	34,994	5.4
46003	SD	Aurora County, South Dakota	2,739	5.1
46009	SD	Bon Homme County, South Dakota	7,080	4
46019	SD	Butte County, South Dakota	9,888	4.5
46021	SD	Campbell County, South Dakota	1,431	4.6
46023	SD	Charles Mix County, South Dakota	9,075	6
46025	SD	Clark County, South Dakota	3,702	3.8
46027	SD	Clay County, South Dakota	13,816	3.7
46033	SD	Custer County, South Dakota	8,085	4.3
46037	SD	Day County, South Dakota	5,714	4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
46039	SD	Deuel County, South Dakota	4,373	4.6
46041	SD	Dewey County, South Dakota	5,354	4
46053	SD	Gregory County, South Dakota	4,272	5.5
46055	SD	Haakon County, South Dakota	1,886	1.6
46057	SD	Hamlin County, South Dakota	5,761	4.8
46061	SD	Hanson County, South Dakota	3,382	0
46063	SD	Harding County, South Dakota	1,250	2.2
46069	SD	Hyde County, South Dakota	1,520	5.5
46071	SD	Jackson County, South Dakota	2,991	1.6
46075	SD	Jones County, South Dakota	1,076	0
46077	SD	Kingsbury County, South Dakota	5,169	4
46085	SD	Lyman County, South Dakota	3,736	2.7
46087	SD	McCook County, South Dakota	5,639	4.5
46093	SD	Meade County, South Dakota	25,156	3.2
46095	SD	Mellette County, South Dakota	2,032	0
46097	SD	Miner County, South Dakota	2,411	3.3
46101	SD	Moody County, South Dakota	6,511	5
46107	SD	Potter County, South Dakota	2,380	3.6
46111	SD	Sanborn County, South Dakota	2,380	5.1
46117	SD	Stanley County, South Dakota	2,896	2.8
46119	SD	Sully County, South Dakota	1,328	0
46121	SD	Todd County, South Dakota	9,575	2.7

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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46123	SD	Tripp County, South Dakota	5,743	5.8
46125	SD	Turner County, South Dakota	8,368	4.9
46129	SD	Walworth County, South Dakota	5,408	3.4
47005	TN	Benton County, Tennessee	16,456	3.7
47007	TN	Bledsoe County, Tennessee	12,946	6
47009	TN	Blount County, Tennessee	121,140	3.5
47015	TN	Cannon County, Tennessee	13,631	5.6
47017	TN	Carroll County, Tennessee	28,644	5
47019	TN	Carter County, Tennessee	57,710	4.4
47021	TN	Cheatham County, Tennessee	38,809	4
47023	TN	Chester County, Tennessee	16,793	4.2
47025	TN	Claiborne County, Tennessee	31,901	4.5
47027	TN	Clay County, Tennessee	7,888	1.9
47029	TN	Cocke County, Tennessee	35,473	3.8
47033	TN	Crockett County, Tennessee	14,524	3.7
47035	TN	Cumberland County, Tennessee	54,977	2.6
47041	TN	DeKalb County, Tennessee	18,569	3.6
47047	TN	Fayette County, Tennessee	37,458	2.3
47049	TN	Fentress County, Tennessee	17,777	4.1
47051	TN	Franklin County, Tennessee	41,054	5.2
47057	TN	Grainger County, Tennessee	22,419	2.9
47059	TN	Greene County, Tennessee	68,172	3.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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47061	TN	Grundy County, Tennessee	13,910	1
47067	TN	Hancock County, Tennessee	6,782	5.6
47071	TN	Hardin County, Tennessee	25,995	4.6
47073	TN	Hawkins County, Tennessee	56,562	6
47077	TN	Henderson County, Tennessee	27,518	5.7
47079	TN	Henry County, Tennessee	32,042	4
47081	TN	Hickman County, Tennessee	24,506	2.1
47083	TN	Houston County, Tennessee	8,286	3.2
47085	TN	Humphreys County, Tennessee	18,416	3.2
47087	TN	Jackson County, Tennessee	11,491	2.6
47089	TN	Jefferson County, Tennessee	50,600	5.2
47091	TN	Johnson County, Tennessee	18,190	4.7
47101	TN	Lewis County, Tennessee	12,003	4.4
47105	TN	Loudon County, Tennessee	47,102	4.7
47107	TN	McMinn County, Tennessee	52,075	4.7
47109	TN	McNairy County, Tennessee	25,760	3.5
47111	TN	Macon County, Tennessee	21,934	4.6
47115	TN	Marion County, Tennessee	28,123	4.8
47117	TN	Marshall County, Tennessee	29,902	5.4
47119	TN	Maury County, Tennessee	79,029	5.1
47121	TN	Meigs County, Tennessee	11,581	1.3
47123	TN	Monroe County, Tennessee	44,015	3.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
47127	TN	Moore County, Tennessee	6,266	2.1
47129	TN	Morgan County, Tennessee	21,664	3.4
47131	TN	Obion County, Tennessee	31,905	4.9
47133	TN	Overton County, Tennessee	21,777	2.5
47135	TN	Perry County, Tennessee	7,778	3.9
47137	TN	Pickett County, Tennessee	5,072	2.1
47139	TN	Polk County, Tennessee	16,690	2.5
47141	TN	Putnam County, Tennessee	70,570	3.7
47145	TN	Roane County, Tennessee	54,156	4.2
47147	TN	Robertson County, Tennessee	64,347	5.1
47153	TN	Sequatchie County, Tennessee	13,814	3.6
47155	TN	Sevier County, Tennessee	87,507	3.4
47159	TN	Smith County, Tennessee	19,035	4.9
47163	TN	Sullivan County, Tennessee	155,815	4.6
47167	TN	Tipton County, Tennessee	59,689	5
47171	TN	Unicoi County, Tennessee	18,257	3.7
47173	TN	Union County, Tennessee	19,088	3.9
47175	TN	Van Buren County, Tennessee	5,503	4.6
47177	TN	Warren County, Tennessee	39,539	4.8
47179	TN	Washington County, Tennessee	119,768	5.7
47181	TN	Wayne County, Tennessee	17,016	2.4
47183	TN	Weakley County, Tennessee	34,557	3.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
47185	TN	White County, Tennessee	25,460	5.2
47187	TN	Williamson County, Tennessee	174,260	5.1
47189	TN	Wilson County, Tennessee	109,563	4.6
48003	TX	Andrews County, Texas	14,048	4.2
48007	TX	Aransas County, Texas	23,247	5.7
48009	TX	Archer County, Texas	9,055	5
48011	TX	Armstrong County, Texas	1,958	0
48015	TX	Austin County, Texas	27,783	3.3
48017	TX	Bailey County, Texas	7,027	2.7
48019	TX	Bandera County, Texas	20,265	0.7
48025	TX	Bee County, Texas	31,896	4.9
48031	TX	Blanco County, Texas	10,085	2.1
48033	TX	Borden County, Texas	564	0
48035	TX	Bosque County, Texas	18,067	4.1
48043	TX	Brewster County, Texas	8,971	3.2
48047	TX	Brooks County, Texas	7,349	4.5
48051	TX	Burleson County, Texas	17,058	3.1
48057	TX	Calhoun County, Texas	21,120	3.1
48059	TX	Callahan County, Texas	13,458	1.7
48065	TX	Carson County, Texas	6,284	0.4
48067	TX	Cass County, Texas	30,254	5.6
48069	TX	Castro County, Texas	7,848	3.2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
48071	TX	Chambers County, Texas	32,371	1.6
48073	TX	Cherokee County, Texas	50,035	5.2
48077	TX	Clay County, Texas	10,922	0.5
48079	TX	Cochran County, Texas	3,155	0
48081	TX	Coke County, Texas	3,301	5.4
48083	TX	Coleman County, Texas	8,857	4.8
48089	TX	Colorado County, Texas	20,751	2.7
48091	TX	Comal County, Texas	102,836	5.3
48095	TX	Concho County, Texas	4,047	1.8
48099	TX	Coryell County, Texas	74,082	3.4
48101	TX	Cottle County, Texas	1,618	1.3
48103	TX	Crane County, Texas	4,141	2.3
48107	TX	Crosby County, Texas	6,207	4.3
48111	TX	Dallam County, Texas	6,471	2.1
48115	TX	Dawson County, Texas	13,853	3.4
48123	TX	DeWitt County, Texas	20,025	3.2
48125	TX	Dickens County, Texas	2,441	5.6
48127	TX	Dimmit County, Texas	9,908	5.6
48129	TX	Donley County, Texas	3,655	3.1
48131	TX	Duval County, Texas	11,999	2.2
48133	TX	Eastland County, Texas	18,560	6
48137	TX	Edwards County, Texas	2,029	0

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
48143	TX	Erath County, Texas	37,142	5.6
48145	TX	Falls County, Texas	17,799	4
48147	TX	Fannin County, Texas	33,765	5.8
48149	TX	Fayette County, Texas	24,175	4
48151	TX	Fisher County, Texas	4,057	4.3
48155	TX	Foard County, Texas	1,379	4
48157	TX	Fort Bend County, Texas	541,983	5.9
48159	TX	Franklin County, Texas	10,675	4.6
48163	TX	Frio County, Texas	16,956	3.7
48169	TX	Garza County, Texas	6,204	3.8
48171	TX	Gillespie County, Texas	24,197	4
48173	TX	Glasscock County, Texas	1,317	0
48175	TX	Goliad County, Texas	7,161	3.3
48177	TX	Gonzales County, Texas	19,635	5.9
48179	TX	Gray County, Texas	22,497	3.3
48185	TX	Grimes County, Texas	26,208	4.8
48187	TX	Guadalupe County, Texas	122,728	5.2
48191	TX	Hall County, Texas	3,424	3.7
48193	TX	Hamilton County, Texas	8,473	1.9
48195	TX	Hansford County, Texas	5,470	4.3
48197	TX	Hardeman County, Texas	4,226	2.4
48199	TX	Hardin County, Texas	53,220	3.2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
48203	TX	Harrison County, Texas	64,484	3.6
48205	TX	Hartley County, Texas	5,963	4.4
48207	TX	Haskell County, Texas	5,842	0.8
48211	TX	Hemphill County, Texas	3,668	0.8
48213	TX	Henderson County, Texas	78,299	4.4
48221	TX	Hood County, Texas	49,816	5.2
48229	TX	Hudspeth County, Texas	3,441	4.6
48233	TX	Hutchinson County, Texas	22,094	3.3
48235	TX	Irion County, Texas	1,673	1.7
48237	TX	Jack County, Texas	9,072	2.6
48239	TX	Jackson County, Texas	13,987	4.1
48241	TX	Jasper County, Texas	35,248	4.6
48243	TX	Jeff Davis County, Texas	2,340	0
48247	TX	Jim Hogg County, Texas	5,211	0.6
48249	TX	Jim Wells County, Texas	40,631	5.3
48251	TX	Johnson County, Texas	147,611	4.3
48253	TX	Jones County, Texas	20,157	4.9
48255	TX	Karnes County, Texas	14,880	4.5
48261	TX	Kenedy County, Texas	241	0
48263	TX	Kent County, Texas	772	5.6
48265	TX	Kerr County, Texas	48,826	5.9
48267	TX	Kimble County, Texas	4,568	2.5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
48269	TX	King County, Texas	219	0
48271	TX	Kinney County, Texas	3,555	4.2
48275	TX	Knox County, Texas	3,708	5
48279	TX	Lamb County, Texas	14,092	4
48285	TX	Lavaca County, Texas	19,217	3.8
48287	TX	Lee County, Texas	16,499	2.4
48289	TX	Leon County, Texas	16,640	1.3
48293	TX	Limestone County, Texas	23,170	5.7
48295	TX	Lipscomb County, Texas	3,218	0
48297	TX	Live Oak County, Texas	11,507	2.3
48299	TX	Llano County, Texas	18,992	5.1
48301	TX	Loving County, Texas	41	
48305	TX	Lynn County, Texas	5,988	2
48307	TX	McCulloch County, Texas	8,220	4
48311	TX	McMullen County, Texas	897	0
48313	TX	Madison County, Texas	13,433	1.5
48315	TX	Marion County, Texas	10,771	5.8
48317	TX	Martin County, Texas	4,606	2.1
48319	TX	Mason County, Texas	3,928	3.7
48327	TX	Menard County, Texas	2,212	0.9
48329	TX	Midland County, Texas	132,103	6
48331	TX	Milam County, Texas	24,934	6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
48333	TX	Mills County, Texas	4,887	1.3
48335	TX	Mitchell County, Texas	9,342	3.1
48341	TX	Moore County, Texas	21,102	5
48345	TX	Motley County, Texas	1,123	3.4
48349	TX	Navarro County, Texas	47,483	5.7
48351	TX	Newton County, Texas	14,389	1.2
48357	TX	Ochiltree County, Texas	9,953	5.4
48359	TX	Oldham County, Texas	2,020	1.5
48361	TX	Orange County, Texas	82,014	4.4
48369	TX	Parmer County, Texas	10,098	5.9
48373	TX	Polk County, Texas	45,590	3.1
48379	TX	Rains County, Texas	10,942	2.8
48381	TX	Randall County, Texas	116,811	4.3
48383	TX	Reagan County, Texas	3,298	3.9
48385	TX	Real County, Texas	3,279	0
48387	TX	Red River County, Texas	12,987	4.6
48389	TX	Reeves County, Texas	13,269	3.7
48391	TX	Refugio County, Texas	7,434	1.9
48393	TX	Roberts County, Texas	877	0
48397	TX	Rockwall County, Texas	73,311	5.6
48401	TX	Rusk County, Texas	52,016	4.6
48403	TX	Sabine County, Texas	10,653	1.2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
48405	TX	San Augustine County, Texas	8,996	5.2
48407	TX	San Jacinto County, Texas	25,859	3.7
48411	TX	San Saba County, Texas	6,023	3.5
48413	TX	Schleicher County, Texas	3,343	2.6
48415	TX	Scurry County, Texas	16,579	1.9
48417	TX	Shackelford County, Texas	3,182	3
48419	TX	Shelby County, Texas	25,423	4.1
48421	TX	Sherman County, Texas	3,000	4.1
48425	TX	Somervell County, Texas	8,200	5.2
48431	TX	Sterling County, Texas	1,160	2.4
48433	TX	Stonewall County, Texas	1,434	1.6
48435	TX	Sutton County, Texas	4,257	2.2
48447	TX	Throckmorton County, Texas	1,814	0
48449	TX	Titus County, Texas	30,995	3.6
48455	TX	Trinity County, Texas	14,451	2.2
48457	TX	Tyler County, Texas	21,472	3.7
48459	TX	Upshur County, Texas	38,685	2.4
48461	TX	Upton County, Texas	3,243	1.1
48463	TX	Uvalde County, Texas	26,285	3.1
48471	TX	Walker County, Texas	66,353	3.5
48473	TX	Waller County, Texas	40,831	4.7
48475	TX	Ward County, Texas	10,505	3.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
48483	TX	Wheeler County, Texas	5,235	1.8
48489	TX	Willacy County, Texas	21,769	5.1
48493	TX	Wilson County, Texas	41,264	3.6
48495	TX	Winkler County, Texas	6,933	1.2
48497	TX	Wise County, Texas	58,054	4.9
48499	TX	Wood County, Texas	41,625	3.3
48501	TX	Yoakum County, Texas	7,706	1.2
48503	TX	Young County, Texas	18,298	4.3
48507	TX	Zavala County, Texas	11,658	5.2
49003	UT	Box Elder County, Utah	48,221	2.1
49005	UT	Cache County, Utah	107,078	3.3
49009	UT	Daggett County, Utah	839	2.6
49011	UT	Davis County, Utah	294,532	3.7
49013	UT	Duchesne County, Utah	17,408	0
49015	UT	Emery County, Utah	10,728	2.2
49017	UT	Garfield County, Utah	4,958	2.8
49027	UT	Millard County, Utah	12,189	4.2
49029	UT	Morgan County, Utah	9,013	0
49031	UT	Piute County, Utah	1,661	0
49033	UT	Rich County, Utah	2,181	0
49037	UT	San Juan County, Utah	14,299	3.4
49039	UT	Sanpete County, Utah	26,651	2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
49041	UT	Sevier County, Utah	20,438	3.4
49043	UT	Summit County, Utah	35,295	2.5
49047	UT	Uintah County, Utah	30,991	4.2
49049	UT	Utah County, Utah	486,067	5
49051	UT	Wasatch County, Utah	22,176	1.9
49053	UT	Washington County, Utah	134,033	6
49055	UT	Wayne County, Utah	2,706	0
50001	VT	Addison County, Vermont	36,841	4.7
50009	VT	Essex County, Vermont	6,359	4.8
50011	VT	Franklin County, Vermont	47,547	5.4
50013	VT	Grand Isle County, Vermont	7,105	4.9
50017	VT	Orange County, Vermont	29,059	3.4
51001	VA	Accomack County, Virginia	34,066	3.3
51005	VA	Alleghany County, Virginia	16,406	3.7
51007	VA	Amelia County, Virginia	12,517	1.1
51009	VA	Amherst County, Virginia	32,315	4.8
51011	VA	Appomattox County, Virginia	14,653	3.7
51015	VA	Augusta County, Virginia	73,201	3.7
51017	VA	Bath County, Virginia	4,779	1.3
51019	VA	Bedford County, Virginia	67,697	2.2
51021	VA	Bland County, Virginia	6,873	0.9
51023	VA	Botetourt County, Virginia	32,867	2.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
51025	VA	Brunswick County, Virginia	17,707	6
51029	VA	Buckingham County, Virginia	16,874	4.4
51031	VA	Campbell County, Virginia	54,174	4.7
51033	VA	Caroline County, Virginia	27,844	4.6
51035	VA	Carroll County, Virginia	29,985	2.9
51036	VA	Charles City County, Virginia	7,205	4.2
51037	VA	Charlotte County, Virginia	12,644	4.8
51045	VA	Craig County, Virginia	5,173	3.6
51051	VA	Dickenson County, Virginia	15,966	2.3
51053	VA	Dinwiddie County, Virginia	27,449	3.3
51057	VA	Essex County, Virginia	10,901	1.6
51063	VA	Floyd County, Virginia	15,030	2.6
51065	VA	Fluvanna County, Virginia	25,308	0.9
51067	VA	Franklin County, Virginia	54,938	4.1
51069	VA	Frederick County, Virginia	75,835	3.5
51071	VA	Giles County, Virginia	17,205	5.6
51073	VA	Gloucester County, Virginia	36,610	2
51075	VA	Goochland County, Virginia	21,136	0.9
51077	VA	Grayson County, Virginia	15,855	1.1
51081	VA	Greensville County, Virginia	12,181	0.7
51083	VA	Halifax County, Virginia	36,311	4.8
51085	VA	Hanover County, Virginia	99,172	4.4

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
51089	VA	Henry County, Virginia	54,860	5.3
51091	VA	Highland County, Virginia	2,395	4.1
51093	VA	Isle of Wight County, Virginia	34,762	5.9
51095	VA	James City County, Virginia	64,386	4.4
51097	VA	King and Queen County, Virginia	6,926	1.9
51099	VA	King George County, Virginia	22,794	3.5
51101	VA	King William County, Virginia	15,509	6
51103	VA	Lancaster County, Virginia	11,478	4.1
51105	VA	Lee County, Virginia	25,434	4.1
51109	VA	Louisa County, Virginia	32,248	3.2
51111	VA	Lunenburg County, Virginia	12,968	5.1
51113	VA	Madison County, Virginia	13,342	2.7
51115	VA	Mathews County, Virginia	9,004	0.6
51117	VA	Mecklenburg County, Virginia	32,774	4.5
51119	VA	Middlesex County, Virginia	10,831	1.4
51121	VA	Montgomery County, Virginia	92,527	6
51125	VA	Nelson County, Virginia	14,989	4.5
51127	VA	New Kent County, Virginia	17,655	1
51131	VA	Northampton County, Virginia	12,572	5.6
51133	VA	Northumberland County, Virginia	12,419	2.5
51137	VA	Orange County, Virginia	32,730	4.8
51141	VA	Patrick County, Virginia	18,643	3.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
51143	VA	Pittsylvania County, Virginia	63,147	5
51145	VA	Powhatan County, Virginia	27,758	2.5
51149	VA	Prince George County, Virginia	35,129	2.3
51157	VA	Rappahannock County, Virginia	7,376	5.2
51159	VA	Richmond County, Virginia	9,328	4.3
51163	VA	Rockbridge County, Virginia	22,217	3.8
51165	VA	Rockingham County, Virginia	74,922	5.6
51167	VA	Russell County, Virginia	28,842	5.8
51169	VA	Scott County, Virginia	23,234	4.7
51173	VA	Smyth County, Virginia	32,383	3.6
51175	VA	Southampton County, Virginia	18,493	4.8
51179	VA	Stafford County, Virginia	124,587	4.2
51181	VA	Surry County, Virginia	7,039	2.1
51185	VA	Tazewell County, Virginia	44,706	4.6
51191	VA	Washington County, Virginia	54,322	4.6
51193	VA	Westmoreland County, Virginia	17,237	2.4
51195	VA	Wise County, Virginia	41,496	4.2
51197	VA	Wythe County, Virginia	29,005	5.1
51199	VA	York County, Virginia	64,846	3.6
51530	VA	Buena Vista city, Virginia	6,653	4.4
51600	VA	Fairfax city, Virginia	22,058	4.3
51735	VA	Poquoson city, Virginia	12,099	4.1

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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53017	WA	Douglas County, Washington	37,160	4.1
53019	WA	Ferry County, Washington	7,504	4.9
53023	WA	Garfield County, Washington	2,240	5.4
53027	WA	Grays Harbor County, Washington	72,092	4.5
53029	WA	Island County, Washington	78,633	4.5
53041	WA	Lewis County, Washington	74,650	5.9
53043	WA	Lincoln County, Washington	10,533	4.2
53045	WA	Mason County, Washington	59,287	3.3
53051	WA	Pend Oreille County, Washington	12,904	2.8
53055	WA	San Juan County, Washington	15,551	5.2
53059	WA	Skamania County, Washington	10,869	5.3
53065	WA	Stevens County, Washington	43,171	4.2
53069	WA	Wahkiakum County, Washington	3,982	2.3
54001	WV	Barbour County, West Virginia	16,256	3.8
54005	WV	Boone County, West Virginia	24,872	5.4
54007	WV	Braxton County, West Virginia	14,558	3.8
54009	WV	Brooke County, West Virginia	24,194	3.6
54011	WV	Cabell County, West Virginia	95,526	6
54013	WV	Calhoun County, West Virginia	7,588	3.8
54017	WV	Doddridge County, West Virginia	8,035	2.7
54019	WV	Fayette County, West Virginia	46,138	5.2
54021	WV	Gilmer County, West Virginia	8,394	1.5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
54023	WV	Grant County, West Virginia	11,942	3.2
54025	WV	Greenbrier County, West Virginia	35,373	3.5
54029	WV	Hancock County, West Virginia	30,866	5.2
54031	WV	Hardy County, West Virginia	13,832	2.2
54035	WV	Jackson County, West Virginia	29,084	2.9
54037	WV	Jefferson County, West Virginia	52,033	4.2
54039	WV	Kanawha County, West Virginia	192,770	4.9
54041	WV	Lewis County, West Virginia	16,406	5.5
54043	WV	Lincoln County, West Virginia	21,879	4.6
54045	WV	Logan County, West Virginia	36,564	2.9
54047	WV	McDowell County, West Virginia	22,555	4.1
54049	WV	Marion County, West Virginia	56,356	4
54051	WV	Marshall County, West Virginia	33,369	3.6
54053	WV	Mason County, West Virginia	27,016	4
54055	WV	Mercer County, West Virginia	61,844	5.9
54059	WV	Mingo County, West Virginia	26,956	1.1
54061	WV	Monongalia County, West Virginia	92,715	5
54063	WV	Monroe County, West Virginia	13,495	0.7
54067	WV	Nicholas County, West Virginia	26,189	1
54071	WV	Pendleton County, West Virginia	7,773	5.4
54073	WV	Pleasants County, West Virginia	7,664	2.5
54075	WV	Pocahontas County, West Virginia	8,808	2.3

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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54077	WV	Preston County, West Virginia	32,976	3.4
54079	WV	Putnam County, West Virginia	54,940	3.4
54081	WV	Raleigh County, West Virginia	78,513	4.8
54083	WV	Randolph County, West Virginia	29,233	2.5
54085	WV	Ritchie County, West Virginia	10,514	2.1
54087	WV	Roane County, West Virginia	15,116	4
54089	WV	Summers County, West Virginia	13,847	2.2
54091	WV	Taylor County, West Virginia	16,732	4.4
54093	WV	Tucker County, West Virginia	7,137	4.1
54099	WV	Wayne County, West Virginia	42,647	6
54101	WV	Webster County, West Virginia	9,247	2.5
54109	WV	Wyoming County, West Virginia	23,993	2
55001	WI	Adams County, Wisconsin	21,044	2.3
55007	WI	Bayfield County, Wisconsin	15,114	2.1
55013	WI	Burnett County, Wisconsin	15,749	3.4
55015	WI	Calumet County, Wisconsin	47,902	5.9
55037	WI	Florence County, Wisconsin	4,587	2.6
55041	WI	Forest County, Wisconsin	9,534	4.7
55049	WI	Iowa County, Wisconsin	23,646	5.8
55061	WI	Kewaunee County, Wisconsin	20,642	5.8
55075	WI	Marinette County, Wisconsin	42,019	5.1
55077	WI	Marquette County, Wisconsin	15,421	4.9

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
55078	WI	Menominee County, Wisconsin	4,251	5.1
55083	WI	Oconto County, Wisconsin	37,737	3.6
55085	WI	Oneida County, Wisconsin	36,379	6
55091	WI	Pepin County, Wisconsin	7,517	6
55107	WI	Rusk County, Wisconsin	14,855	3.6
55113	WI	Sawyer County, Wisconsin	16,615	4.2
55115	WI	Shawano County, Wisconsin	41,842	3.8
55125	WI	Vilas County, Wisconsin	21,750	2.5
55129	WI	Washburn County, Wisconsin	16,001	3.8
55137	WI	Waushara County, Wisconsin	24,631	5.7
56003	WY	Big Horn County, Wyoming	11,448	4
56005	WY	Campbell County, Wyoming	43,179	3.1
56007	WY	Carbon County, Wyoming	15,624	2.8
56011	WY	Crook County, Wyoming	6,761	1.7
56013	WY	Fremont County, Wyoming	38,875	4.9
56015	WY	Goshen County, Wyoming	12,844	4.2
56019	WY	Johnson County, Wyoming	8,307	5.4
56021	WY	Laramie County, Wyoming	89,221	5.9
56023	WY	Lincoln County, Wyoming	17,447	0.4
56031	WY	Platte County, Wyoming	8,655	5
56035	WY	Sublette County, Wyoming	9,322	4
56037	WY	Sweetwater County, Wyoming	42,266	5.5

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
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56039	WY	Teton County, Wyoming	20,802	2.8
56043	WY	Washakie County, Wyoming	8,271	5.4
56045	WY	Weston County, Wyoming	7,066	1.7
72001	PR	Adjuntas Municipio, Puerto Rico	19,541	4.6
72003	PR	Aguada Municipio, Puerto Rico	42,232	4
72007	PR	Aguas Buenas Municipio, Puerto Rico	28,827	2.9
72009	PR	Aibonito Municipio, Puerto Rico	26,161	5.7
72011	PR	Añasco Municipio, Puerto Rico	29,254	5
72013	PR	Arecibo Municipio, Puerto Rico	97,633	5.3
72017	PR	Barceloneta Municipio, Puerto Rico	24,506	3
72019	PR	Barranquitas Municipio, Puerto Rico	30,272	1.6
72021	PR	Bayamón Municipio, Puerto Rico	212,183	4.7
72023	PR	Cabo Rojo Municipio, Puerto Rico	50,468	4.3
72027	PR	Camuy Municipio, Puerto Rico	35,381	3.6
72029	PR	Canóvanas Municipio, Puerto Rico	47,151	4.1
72031	PR	Carolina Municipio, Puerto Rico	179,356	5
72037	PR	Ceiba Municipio, Puerto Rico	14,493	6
72039	PR	Ciales Municipio, Puerto Rico	19,067	4.7
72041	PR	Cidra Municipio, Puerto Rico	43,604	4.4
72043	PR	Coamo Municipio, Puerto Rico	40,229	2.9
72045	PR	Comerío Municipio, Puerto Rico	20,773	2.6
72047	PR	Corozal Municipio, Puerto Rico	37,312	2.2

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
72049	PR	Culebra Municipio, Puerto Rico	1,939	1.9
72051	PR	Dorado Municipio, Puerto Rico	37,631	3.2
72054	PR	Florida Municipio, Puerto Rico	12,697	4
72055	PR	Guánica Municipio, Puerto Rico	19,990	4.9
72057	PR	Guayama Municipio, Puerto Rico	45,416	4.6
72059	PR	Guayanilla Municipio, Puerto Rico	21,986	3.4
72061	PR	Guaynabo Municipio, Puerto Rico	98,875	5.3
72063	PR	Gurabo Municipio, Puerto Rico	44,073	2.7
72065	PR	Hatillo Municipio, Puerto Rico	41,645	1.3
72067	PR	Hormigueros Municipio, Puerto Rico	17,213	5
72069	PR	Humacao Municipio, Puerto Rico	58,924	3.4
72073	PR	Jayuya Municipio, Puerto Rico	16,865	1.9
72075	PR	Juana Díaz Municipio, Puerto Rico	51,020	4.6
72079	PR	Lajas Municipio, Puerto Rico	26,000	3.5
72081	PR	Lares Municipio, Puerto Rico	31,600	4.9
72083	PR	Las Marías Municipio, Puerto Rico	10,156	3.2
72085	PR	Las Piedras Municipio, Puerto Rico	38,146	5.3
72087	PR	Loíza Municipio, Puerto Rico	30,703	4
72089	PR	Luquillo Municipio, Puerto Rico	20,131	1.5
72093	PR	Maricao Municipio, Puerto Rico	6,244	2.3
72099	PR	Moca Municipio, Puerto Rico	40,280	1.3
72101	PR	Morovis Municipio, Puerto Rico	32,339	3.6

Table 2.2: SPRAC-Ineligible Counties

GEOID	State	County	Population	% of HHs w/ at least one person 62+ that are low income renters w/ at least one housing problem
72105	PR	Naranjito Municipio, Puerto Rico	30,460	2.5
72107	PR	Orocovis Municipio, Puerto Rico	23,646	0.7
72109	PR	Patillas Municipio, Puerto Rico	19,552	5.9
72111	PR	Peñuelas Municipio, Puerto Rico	24,879	2.7
72117	PR	Rincón Municipio, Puerto Rico	15,203	2.8
72119	PR	Río Grande Municipio, Puerto Rico	54,270	5.8
72121	PR	Sabana Grande Municipio, Puerto Rico	25,532	4.3
72123	PR	Salinas Municipio, Puerto Rico	31,265	4.7
72125	PR	San Germán Municipio, Puerto Rico	35,997	3.5
72129	PR	San Lorenzo Municipio, Puerto Rico	41,300	5.4
72131	PR	San Sebastián Municipio, Puerto Rico	42,982	5.7
72135	PR	Toa Alta Municipio, Puerto Rico	72,756	2
72137	PR	Toa Baja Municipio, Puerto Rico	90,867	4.9
72139	PR	Trujillo Alto Municipio, Puerto Rico	75,464	3.4
72141	PR	Utua Municipio, Puerto Rico	33,741	5.7
72143	PR	Vega Alta Municipio, Puerto Rico	39,807	2.2
72145	PR	Vega Baja Municipio, Puerto Rico	60,436	2.4
72147	PR	Vieques Municipio, Puerto Rico	9,313	1.1
72149	PR	Villalba Municipio, Puerto Rico	26,565	5.7
72151	PR	Yabucoa Municipio, Puerto Rico	38,387	5
72153	PR	Yauco Municipio, Puerto Rico	43,082	4.2

Table 2.2: SPRAC-Ineligible Counties